



**Central Office**  
Myddelton House  
115-123 Pentonville Road  
London N1 9LZ

Tel: 020 7833 2181  
Fax: 020 7833 4371  
[www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)

Patrick Guthrie  
Director of Strategy and Communications  
PhonepayPlus  
Clove Building  
4 Maguire Street  
London  
SE1 2NQ

27 September 2012

Dear Patrick

I write to provide a brief response to the Phonepay Plus (PPP) consultation on a prior-permissions regime for Information, Connection and/or Signposting Services (ICSS).

The evidence of consumer harm presented in your consultation document is persuasive and we support the proposed prior-permissions regime for this type of service.

The misleading practices of some ICSS providers identified by PPP are indefensible and we struggle to see any reason why providers would seek to imitate another organisation or disguise the true cost of using their service except to mislead or otherwise take advantage of consumers. A prior-permissions regime would address these problems whilst still allowing legitimate ICSS providers to operate.

The case for action is further strengthened by the possibility that the activities of unscrupulous ICSS providers could undermine the positive effects for consumers of two forthcoming public policy changes: Ofcom's intention to make 080 numbers free to call from mobiles and the effect of the Consumer Rights Directive in requiring companies not to charge premium rates for customer service phone lines.

The benefits of reducing the cost to consumers of calling such telephone services, which cause clear consumer detriment at present, could be eroded by ICSS behaving in the ways highlighted in the consultation document. This makes the case for an improved regulatory approach stronger still.

Kind regards

**Nick Waugh**