

# RESPONSE TO PHONEPAYPLUS' REVIEW OF INFORMATION, CONNECTION AND / OR SIGNPOSTING SERVICES

Cable&Wireless  
Worldwide

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Cable&Wireless Worldwide welcomes PhonepayPlus' decision to review Information, Connection and Signposting Services (ICSS). As a company Cable&Wireless Worldwide is a major terminator of traffic in the Non-Geographic Calls Services (NGCS) market with clients ranging from organisations operating traditional PRS through to major corporates using NGCS as a customer front door to their services.

It is within this context that Cable&Wireless Worldwide has been alerted on several occasions to the unscrupulous nature of some of the current ICSS 'services'. The complaints have come predominantly from our major corporate customers who express their extreme dissatisfaction at finding their numbers included on ICSS sites and in some cases the fact that they are being associated with PRS numbers. Such organisations invest heavily in their customer service offerings and choose contact mechanisms and price points which are reflective of both the commercial needs of their business and more importantly the reputation of the brand with which they wish to be associated. In a number of cases that have been highlighted to Cable&Wireless Worldwide, the perfectly accessible and well publicised 084x and 087x numbers of major retail companies have been translated to via an ICSS provider's far more expensive PRS number.

Even leaving aside the obvious 'scams' with misleading information and poor pricing information these services do not appear to specialise in the 'difficult to find' numbers they claim, but link to numbers which are easily accessible by other means, including from the company websites to which some now provide an url (although curiously never pointing to the 'contact us' page which would actually provide the cheaper alternative numbers). There is little justification for such 'services' which are seen to thrive upon the lack of pricing clarity and consumer awareness Ofcom identified as being a major issue in its NGCS Review. Greater protection must be offered to prevent the significant potential for consumer harm as well as a retailer's reputational harm and we strongly welcome the introduction of a robust prior permission regime as representing a minimum step.

It is difficult to see however how connecting a £1.53 PRS number through to lower cost 08 numbers can ever be guaranteed to meet PhonepayPlus' requirements of no undue delay and an answer

within 10 seconds. Although it should be noted that some ICSS providers seem to believe they have a solution to this issue already.<sup>1</sup>

Cable&Wireless Worldwide does recognise that there are some genuine services which operate upon an ICSS model. In our experience these tend to have agreements with the organisations providing the service in question; for example a group of hotels may prefer to use an ICSS to attract and process bookings or a large organisation may seek to employ an ICSS to provide administrative support so as to not detract from their focus on delivering consumer services. The key here is that these organisations exist with the blessing of the organisation providing the genuine service and in our experience both the ICSS and the underlying company makes such relationships transparent. They are not, by way of contrast, purporting to be Directory Enquiry services which are unable to connect to more than a handful of numbers. We concur with the significant differences which PhonepayPlus has identified between the two types of service. Cable&Wireless Worldwide welcomes the introduction of a strong Prior Permission regime which will protect those ICSS operators able to demonstrate that they are providing a genuine service.

Cable&Wireless Worldwide acknowledges the investigation PhonepayPlus has conducted into Search Engine Optimisation and the contractual arrangements which companies such as Google make with ICSS organisations. We welcome the initiative to understand such organisations in order to ensure that the proposed Prior Permission regime can work in tandem with existing contractual restrictions. This is a level of detail with which Network Operators are likely to be unfamiliar. We seek confirmation from PhonepayPlus that the due diligence, risk and control measures expected of Network Operators will relate to the existence of a Prior Permission certificate and not a disproportionate expectation of an understanding of the ICSS' utilisation of Search Engine Optimisation.

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<sup>1</sup> Cable&Wireless Worldwide was made aware of <http://www.travelhelplines.co.uk> following a complaint from one of the organisations listed. The disclaimers below the PRS numbers include this unacceptable mechanism designed to avoid undue delay requirements and somewhat misleading 'cost effective' claim: "If you find yourself in a queue or disconnected for any reason please call back on the number announced on your call. Alternatively, the contact number can be found on the required organisations website. We are not associated, nor affiliated with any travel organisation, but act simply as a cost effective call connection service".