

Paul Whiteing  
ICSTIS  
Clove Building  
4 Maguire Street  
London  
SE1 2NQ

3<sup>rd</sup> July 2007

Dear Paul,

**Re: ICSTIS Consultation – Enhancing Stakeholder Engagement**

The premium rate industry (and it is an industry, not merely a payment mechanism as some people would portray it), is indeed going through fundamental change as stated by Sir Alistair in his opening. Having been close to the sharp end of the PRS industry and its regulation since its infancy my overwhelming desire is for a simplification of the code and the adjudication system. Both of these in my opinion have become overly complex and hamstrung by legal complexities in recent times. The underlying principles of legal, transparent and honest need to be brought back to the forefront of the regulatory process. The legal profession in the same period has introduced all sorts of measures to shorten and simplify their processes and now increasingly rely on dispute arbitration and other measures to find shorter term solutions.

**Section 1 Our Vision**

Q1. I am in broad agreement with the outlined responsibilities, however, raising public awareness can be an expensive process and needs to be carefully approached. Often at time of crisis ICSTIS seems drawn into the news/media frenzy and forced to take an apologist stance, I think this is counter productive and that a different crisis management approach is required.

**Section 2 Our Key Stakeholders**

Q2 I am in general agreement with the suggested stakeholders groups, however, it does beg the question of how you get a representative sample of those groups. All the

Bullet points seem reasonable, with regard to accountability, I feel ICSTIS has been less accountable since the industry was forced to relinquish budget approval.

Consumer confidence is important in PRS and when it is lost, revenues fall, however, it is really service innovation that drives PRS revenues. I have misgivings about ICSTIS seeing its role as one of trying to build consumer confidence, the central tenet of fast effective regulation and a cleaner industry that will automatically increase consumer confidence.

### **Q3**

The relationship between the Industry and ICSTIS has been a difficult one and the feedback I have been getting back from the role of ILP has been negative. I think the terms of ILP needs to be revisited and reworked and made meaningful, INOC was a better vehicle for communication and developing ideas. What is essential is involvement of stakeholders in all levels of the value chain, those with a real interest in Premium Rate Services rather than general telephony. The area of success has definitely been the ICSTIS forums and the way they have changed from presentation delivery to engagement and inclusive approval I think this should be built upon.

### **Q4 ICSTIS website**

This has improved considerably and is much quicker, the one obvious area of improvement would be to have more data available and the ability to search thoroughly. There have been discussions on having a more powerful database which can interact with other databases. A working wapsite would be a logical development so that ICSTIS can be accessible on the move.

### **Q5 Stakeholder Expectations**

I am in general agreement of this as set out

## **Section 4**

Measuring Success – Key Performance Indicators (KPI's) are an essential part of making sure stakeholders are getting effective regulation and should be integral part of annual reporting. Consumer research and PRS I would question the value of this so far and feel it is costly exercise in self fulfilment and needs to be well thought out at the offset .

### **Q6 Other measures**

This seems comprehensive and inclusive it is just a matter of what weight is applied to each category.

**Q7**

I agree with these criteria

I think that you have compiled a very thorough document and a solid approach to looking at stakeholder engagement, lets hope this can now be delivered.

I hope that the responses you receive reflect the importance of the issues you seek to address.

Yours sincerely

Robert Johnson