



UKCTA Response to the ICSTIS Consultation: Enhancing Stakeholder Engagement

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Introduction

UKCTA welcomes this opportunity to comment on ICSTIS's views on engaging with stakeholders.

UKCTA is a trade association promoting the interests of competitive fixed-line telecommunications companies competing against BT, as well as each other, in the UK's residential and business markets.

Q1. Do you agree with the responsibilities we have outlined above? If not, why not?

We agree with the general bullets but would make the following comments:

- *raise awareness about the work of ICSTIS and the industry we regulate, thus providing n opportunity to build consumer trust in PRS through assisting consumers to understand how they can protect themselves and what to do if concerns or problems arise.*

We agree with the principle but stress that such awareness raising should always be carried out in full consultation with industry. Awareness raising can be costly and it is important that it is correctly covered by the budget with industry buy in. The focus should also always be on the consumer aspects of using PRS sensibly, rather than on ICSTIS per se.

- *educate consumers about PRS so that they are best able to protect themselves and their children from possible problems that can arise.*

Arguably the role of educating consumers falls within Ofcom's media literacy remit. However, if ICSTIS can agree funding for such activity with its funders then there is no



reason why it should not carry out this role within the PRS arena. That said, we would expect this to be done in consultation with industry. ICSTIS should also do more to encourage Service Providers to provide better information to consumers on their PRS services.

We also believe that an additional bullet point is needed:

- *To foster trust and confidence in premium rate services whilst providing effective consumer protection*

Q2. Do you agree that all stakeholders require these things from ICSTIS. Are there other requirements which are generic to stakeholders?

We agree with the list.

Q3. Do you agree with our assessment of the needs and the specific stakeholder groups identified above? If not, where do you disagree and why?

Overall we are happy with what is set out in the consultation paper, but with a couple of comments:

- We would expect ICSTIS to be accountable rather than answerable to industry. Funders expect ICSTIS to be reasonable in its approach to regulating, whilst also being transparent and open to the way it operates and sets a budget. This should also apply to ICSTIS decision making, where on occasion it appears that the views and needs of the industry are not taken fully into account.
- ICSTIS is also accountable to Ofcom for the way it regulates, to ensure it is carrying out its obligations under the Communications Act.
- We are not convinced that ICSTIS needs to be “answerable” to the media. It’s number one aim should be sure it carries about proper reasonable regulation to provide consumer protection. ICSTIS does, however, need to court media support to promote the positive aspects of PRS and strengthen consumer information and awareness, and protection.

Q4. How could we improve our engagement through the ICSTIS website?

Generally speaking we find the ICSTIS website easy to follow and to locate most information. Where it is lacking is in providing general information about “precedents” set by adjudications. In the service provider and network areas of the website it would



be better to have more information about some of the “not in the Code” expected regulation. As an example, there is nothing on the website about “undue delay” in terms of what is acceptable. It is not referenced in the Code and there is no information about it on the website, despite the fact that adjudications have led to there being an “understood” amount of time that is acceptable.

Such information should be readily available, otherwise new entrants into the PRS market will miss what are effectively “unwritten rules” which they must abide.

Q5. Are there any stakeholder expectations that we may have overlooked?

From a fixed line telecom’s perspective we are very grateful for the time that ICSTIS employees have spent addressing our needs. We have always found them to be courteous and timely in their responses to our queries. We are glad to see that such commitment is acknowledged in the consultation paper and are grateful that such commitment will continue.

Q6. Are there other measures that would contribute to benchmarking our success in improving stakeholder engagement?

No.

Q7. Do you agree that we should adopt these six criteria for consultation purposes? If not, why not?

Yes we fully support the idea that ICSTIS should adopt and follow these six criteria for better regulation.