

# Registration Scheme for Premium Rate Services

UKCTA Response to PhonepayPlus  
Consultation

Submitted to Ofcom: 24<sup>th</sup> May 2010

UKCTA is a trade association promoting the interests of competitive fixed-line telecommunications companies competing against BT, as well as each other, in the residential and business markets. Its role is to develop and promote the interests of its members to Ofcom and the Government. Details of membership of UKCTA can be found at [www.ukcta.com](http://www.ukcta.com).

UKCTA welcomes the opportunity to respond to the interim update relating to development of the PhonepayPlus registration scheme. In our comments upon PhonepayPlus' 2010/11 Business Plan and Budget we welcomed the willingness of PhonepayPlus to tackle the source of any breaches of the Code of Practice no matter where in the value chain the breach actually occurred. As part of this endorsement we recognised that the introduction of a registration database forms a fundamental cornerstone in the ability to identify the source of any breach. Without the ability to accurately identify those responsible for breaches it is impossible to effectively and efficiently target those who abuse the system.

UKCTA members fully support the principles behind the introduction of the registration scheme and agree that these will continue to be valid throughout the development. We have not commented here on the issues PhonepayPlus has signalled it will consider as part of the consultation for the 12<sup>th</sup> Code of Practice. UKCTA members will be happy to continue to provide input through the ILP or on a bilateral basis to help inform PhonepayPlus' plans ahead of the formal consultation.

It should be noted however that there are some aspects in the detail of the new Code proposals which are likely to concern UKCTA members, particularly in respect to the due diligence and assessment of risk requirements. Any endorsement of the registration scheme proposals at this stage should not be seen as agreement to the wider proposals for the 12<sup>th</sup> Code. There is a need within the PRS industry for PhonepayPlus and industry members to be able to fully identify all of the companies within the market and to be able to identify where problems arise. The Registration

Scheme offers a means for doing this irrespective of the exact requirements of the 12<sup>th</sup> Code.

UKCTA is being asked whether it agrees that PhonepayPlus should continue with the implementation of the Registration Scheme, irrespective of the fact that consultation on the 12<sup>th</sup> Code is yet to be concluded. We have noted a differentiation between the benefits brought by the Registration Scheme itself and the detailed obligations the 12<sup>th</sup> Code seeks to impose. UKCTA believes that the elements of the Code which cause concern do not in themselves invalidate the need for the Registration Scheme. However agreement of a need for the Registration Scheme does not validate the proportionality of all of PhonepayPlus' due diligence proposals which will be addressed through the current consultation on the new Code of Practice.

UKCTA would have preferred to have seen the registration scheme consulted upon in conjunction with and as an integral part of the new code, rather than as a separate activity. However we acknowledge that on this occasion a separate approach may well prove to be expedient. We agree that work on the Registration Scheme should continue at PhonepayPlus' financial risk, subject to any fundamental objections to the new Code or in the current climate, restrictions upon PhonepayPlus' budget.

**- End -**