

Mark Collins
Policy Advisor
ICSTIS
Clove Building
4 Maguire Street
London SE1 2NQ

6 September 2007

Dear Mr Collins,

Re: Regulation of Anonymous SMS Messaging Services

I am writing on behalf of Euro Digital Corporation Limited in response to the above consultation.

We do not operate anonymous SMS services as described in Annex A and B of the consultation. However, we do operate SMS dating services that have some of the characteristics of anonymous SMS services. Our comments are therefore related to the definition of anonymous SMS.

Most SMS dating services allow users to communicate with each other via a mailbox system. We believe these types of services should be excluded from the definition of anonymous SMS for the following reasons:

1. Messages can only be sent between users of the service so to send or receive messages the user would have had to join the service at some point to get a mailbox number allocated.
2. Although the mobile number of the sender will not be revealed to the recipient, the sender of the message will be identified by a box number.
3. The sent messages use the short code associated with the service as the originating address. The recipient is therefore aware that the message is sent via the dating service they have joined.
4. The recipient can block messages from certain mailbox numbers.
5. The recipient can leave the service by sending STOP, in which case no further messages will be sent to their mobile.
6. The recipient knows the identity of the service provider and can easily raise a complaint which can be investigated.

For these reasons we believe there is not the same risk of consumer harm or distress as with the anonymous SMS services described in Annex A and B and dating services using a mailbox system for communication should therefore be excluded from the definition.

We have no specific views on the other points raised in the consultation document.

If you need any further information, please do not hesitate to contact us.

Yours sincerely,

Anders Holst
Director

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