



Operational Report

2015-2016 - Quarter 3

Based on data ran on: 18 March 2016

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1.0 INTRODUCTION

Introduction

We are the UK's independent regulator of premium rate services, and our vision is that anyone can use premium rate services (PRS) with absolute confidence in a healthy and innovative market.

As the telecoms, internet and payments sectors continue to experience an unprecedented rate of change and innovation, we take positive action to safeguard consumers and help cutting-edge providers of digital content and services to thrive. Within our remit and expertise, we seek a more consistent approach to regulating micropayments that are like PRS.

Our mission is to achieve our vision and be a world-class regulator by:

- Putting the consumer at the heart of everything we do through providing effective regulation, information and assistance;
- Understanding the market in which we operate and how it is evolving, so that we can take early, proportionate and targeted action where needed to prevent consumer harm;
- Working with providers to build a healthy market with high standards of compliance;
- Having a Code of Practice, approved by Ofcom, that is cutting edge in protecting consumers while also supporting innovation in a fast-changing digital landscape;
- Applying our Code in a way that is impartial, fair, transparent, effective and proportionate;
- Working with Government, other regulators, industry, consumer bodies and international partners on matters within our remit and expertise.

As published in our Strategic Plan 2014-17, we have five key objectives that shape our work as a quality regulator and ensure we adhere to high standards however the market fluctuates. Adherence to these strategic objectives is enabling us to pursue our mission with clarity and confidence in a fast-moving market:

- Objective 1: to continue to drive up compliance levels and trust in the market
- Objective 2: to identify and prevent emerging risks to consumers
- Objective 3: to help consumers use premium rate services with confidence
- Objective 4: to ensure that regulatory frameworks keep pace with market changes
- Objective 5: to deliver effective and efficient regulation

This Operational Report provides us with the opportunity to indicate how we are doing against our strategic objectives, and to provide an overview of our regulatory context.

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2.0 PERFORMANCE AGAINST STRATEGIC OBJECTIVES

Objective 1: To continue to drive up compliance levels and trust in the market

Updating our Code of Practice and Guidance to ensure they remain effective and future-proof.

During 2015/16 we have continued to devote the appropriate level of resources needed to ensure we maintain and develop our Code of Practice in collaboration with all stakeholders:

- Code 13 came into force on 1 July 2015 to coincide with the implementation of Ofcom's changes to non-geographic call services. At the same time a series of new special conditions were introduced and we published a number of pieces of amended guidance to take account of the new Code provisions. Guidance and Special conditions were the subject of full consultation and industry seminars, with industry feedback informing the final versions published;
- We recognised the need to initiate a comprehensive review of Part 4 of the Code, taking in our investigations, adjudication and sanctions procedures. We have conducted informal consultation with industry and Ofcom in advance of publishing a formal consultation document on the new model in November 2015. We will continue to work towards incorporating changes into a new Code 14, for which we need to both obtain Ofcom's approval and meet a requirement to notify the EU. At this stage we expect to implement Code changes later in 2016, ahead of which we will also be publishing the supporting procedures associated with the new Code provisions;
- In continuing to review and develop our Code guidance to industry, we have reviewed all of our published guidance that was not updated at the time of the publication of Code 13 to make sure it remains effective and deals with current market issues. We are currently consulting with stakeholders on revised guidance.

We have also issued a number of other pieces of information for industry, including:

- A compliance update on the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013;
- An information note on the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015;
- An information note on the Consumer Rights Act 2015.

Engaging actively, and sharing information with industry and other stakeholders throughout the value chain.

We have aimed to deliver high levels of compliance in partnership with industry, through:

- Working alongside a new chair, developing the Industry Liaison Panel into a more effective forum for engagement and dialogue between industry and PhonepayPlus. In particular we have instituted a Rapid Response Team with terms of reference designed to speedily address issues of concern to both the industry and the regulator;
- Expanding our programme of one-to-one meetings and engagement with industry representative bodies, network operators, service providers (merchants and aggregators), and their compliance companies;
- Embedding our Spring and Autumn Forums (held in April and November 2015 respectively) as a central part of our dialogue with industry, with greater industry participation both as speakers and panellists and from the audience.

Making effective and proportionate use of enforcement powers under our Code of Practice.

Increased industry collaboration is enabling us to better develop proportional policy solutions, and we continue to ensure we apply a proportional approach into how we regulate:

2.0 PERFORMANCE AGAINST STRATEGIC OBJECTIVES

- We have strengthened the application of the "polluter pays" principle in Code 13. Working with Government we have also clarified our power to impose sanctions of up to £250,000 per breach of the Code;
- We have built checks and balances into our internal systems to ensure a proportional approach is applied when deciding on whether to pursue enforcement or not, and, if so, whether this is informal (Track 1) or formal (Track 2);
- Our review of Part 4 of the Code during 2015/16 is intended to produce provisions that will ensure effective, fair and proportionate use of our enforcement powers.

Objective 2: To identify and prevent emerging risks to consumers

Using research and market intelligence to identify emerging issues in the market.

In collaboration with industry stakeholders, we are developing our collective market insight capabilities through research:

- We have invested in an Annual Market Review to best inform a collective view on the outlook for premium rate services. Our Annual Market Review 2015, published in July 2015, showed that the market continues to be challenging, with most areas of the market continuing a recent trend of decline. There were, however, three service areas - gaming, giving and gambling - that bucked this trend and showed significant growth;
- We plan to commission further work in 2015/16 that builds on the research done for the Annual Market Review 2015 to understand better consumer attitudes to PRS. We are currently in the process of commissioning research that will give us further insight into how consumers interact with PRS, particularly PRS discovered and consumed online. This will inform further engagement with industry and the development of best practice guidance.

Alongside this we have continued to develop how we collect, handle and share market intelligence we receive directly:

- We have improved our telephone and online consumer contact processes, enabling better granulation of data;
- We have developed an independent search tool that comprehensively scans the market, and has significantly enhanced our pre-emptive policy making and enforcement work.

In 2015/16 both of these developments have in particular informed our work with industry on competition services and adult services, and enabled us to better support complaint handling by network operators and service providers.

Developing our market expertise and partnerships with other regulators, consumer bodies, trade bodies and organisations such as internet security companies.

We recognise the importance to the PRS market of a joined-up and collaborative approach to regulation, and during this year:

- We have supported the Association for Interactive Media & Entertainment's (AIME) development of its Early Warning System as a tool to aid industry compliance;
- Following on from the work of the Rapid Response Team on competition services, we are supporting AIME's engagement with Trading Standards on issues relating to compliance of certain Premium Short Message Services (PSMS) with the Consumer Contracts Regulations;
- We will continue to build partnerships with an extensive range of regulatory and enforcement bodies, including the Financial Conduct Authority, Competition and Markets Authority, Advertising Standards Authority, Payments Systems Regulator, Information Commissioner's Office, Action Fraud, Trading Standards, Telecommunications UK Fraud Forum, Which?, Communications Consumer Panel, and the Consumer Forum for Communications.

2.0 PERFORMANCE AGAINST STRATEGIC OBJECTIVES

In collaboration with phone providers and others, taking early action through enforcement, policy development and other tools to prevent emerging issues from becoming active problems.

We have been able in 2015/16 to make significant strides in embedding our new, holistic approach to regulation, with a balanced emphasis on prevention of future harm to consumers alongside seeking to hold to account those responsible for consumer harm and bringing the market into disrepute:

- The Rapid Response Team approach, under the auspices of the Industry Liaison Panel, has been agreed, with a set of principles published on the PhonepayPlus website. A Rapid Response Team was convened in June to tackle unusually high complaint volumes arising on competition services. This resulted in the Mobile Network Operators taking action on their Payforit scheme rules, and further industry development of best practice guidance on PSMS payment flows. Current analysis indicates that this work has been a factor in seeing complaint levels to PhonepayPlus start to drop in the third quarter of 2015/16;
- Alongside this we continue to work both with individual networks and the Mobile Broadband Group to build an understanding of those areas where a greater consistency of approach can be achieved, particularly with regard to the networks' own compliance frameworks for PRS providers;
- Our consultative work with industry on the review of the second phase of guidance to Code 13 aims to provide greater clarity on compliance to providers, which in turn is designed to prevent consumer harm through inadvertent non-compliance with the Code.

Objective 3: To help consumers to use premium rate services with confidence

Helping consumers to obtain redress where they have suffered harm.

During 2015/16 we have developed a number of ways in which consumer confidence in PRS can be underpinned through improved means of customer care:

- We have improved our signposting of consumers to the correct organisation that can resolve their problem in the first instance. This has included the installation of a new interactive voice recording on the PhonepayPlus consumer helpline, and enhancing our website to provide clearer information for consumers, e.g. the Solutions Centre content developed in conjunction with industry;
- We are taking a more targeted approach to our contact with industry, with a specific contact programme designed for those L2 providers responsible for the 30 most complained about services;
- We are working with individual networks (with Ofcom engagement) to identify opportunities for improved consumer complaint resolution;
- We continue to seek increased informal contact with L1 and L2 providers to support the practical application of improved consumer journeys;
- We are starting to explore how best to develop Number Checker into a more consumer friendly Billchecker, incorporating differences in all network billing systems.

Putting in place additional protection for vulnerable consumers, such as children.

We continue to work with industry to ensure the highest standards of protection are in place for vulnerable PRS consumers:

- Following desk research undertaken at the start of 2015/16, we published in July a discussion paper on consumer vulnerability and PRS. We are subsequently using the paper and industry feedback to develop guidance in support of the relevant provisions in Code 13. As part of that work, we have held workshops with a range of stakeholders to explore how industry can deliver the highest standards of protection while avoiding unintended consequences;
- We are working with app stores during their grace period of exemption from price caps on services targeted towards children. Our aim is to ensure that the measures they are putting in place as an alternative to price caps provide sufficient protection to enable the exemption to be made permanent.

2.0 PERFORMANCE AGAINST STRATEGIC OBJECTIVES

In collaboration with partners, providing information and support to consumers about potential risks and how to avoid them.

We are committed to enhancing consumer education around the use of PRS services, and have undertaken a number of different initiatives in 2015/16:

- The PhonepayPlus website has been overhauled and updated to provide better and clearer information for consumers. We have also increased our use of social media to highlight relevant information from our own work and the work of partners such as Ofcom for consumers – and our monitoring suggests that this is increasing the reach of our consumer information;
- We have targeted consumer information towards younger people using our PhoneBrain website <http://www.phonebrain.org.uk/>. We have also partnered with Childnet International to reach young people by sponsoring a PhoneBrain category in Childnet's existing national film competition. Young people have been able to engage with the issues through participation in the competition, and by viewing the winning entries which are available on our website and those of partners;
- We are currently reviewing the consumer education material available through our website, and plan to enhance this through producing short and punchy videos on specific aspects of PRS;
- We continue to develop our relationships with other regulators and consumer representative bodies in order to increase the syndication of PhonepayPlus consumer advice through those organisations;
- The research that we are commissioning will provide us greater insight into how consumers interact with PRS. In addition, therefore, to developing best practice guidance with industry, we also hope to use the findings to be able to provide better information for consumers that will help them use PRS with greater confidence and safety.

Objective 4: To ensure that regulatory frameworks keep pace with market changes

Developing our knowledge of how the market in digital content and services is changing and of the implications of this for consumers, providers and regulation.

With our approach to regulation focussed on outcomes, we have aimed in 2015/16 to balance support for the development of new and innovative business models with high levels of consumer protection:

- The launch and application of Code 13 moves from a regime of prior permissions (which had to be sought before a new service could be launched) to published special conditions, which now allow service providers from the outset to design services in compliance with our Code;
- The completion of our app stores pilot resulted in one provider introducing a series of amendments and additional protections, leading in turn to a significant reduction in related complaints addressed to PhonepayPlus. With such protection in place, this has allowed us to confirm that the exemptions in the pilot could be made permanently available. We will also be working with app stores on alternatives to price caps for services targeted towards children, and on assessing the impact of the grace period we granted;
- We conducted analysis on mobile voice shortcodes charged at 20ppm or less, and were able to conclude that this service represented low risk of consumer detriment - leading to our exemption of these services from some requirements of the Code in June 2015;
- We are continuing to work with providers and other regulators - notably the Financial Conduct Authority - to understand new digital payment models, the interaction (or otherwise) of PRS regulation in this area, and the possible impact on consumer behaviour.

Working with industry, other regulators and government to build a consensus on the best and most effective responses to these changes.

Our work in this area in 2015/16 covers potentially highly significant legislation for the PRS industry:

2.0 PERFORMANCE AGAINST STRATEGIC OBJECTIVES

- We have worked closely with industry representatives to ensure that the industry position was fully understood by UK government officials negotiating the revision of the EU Payment Services Directive (PSDII);
- We continue to work with industry representatives, HM Treasury and the Financial Conduct Authority as they prepare for the implementation of PSDII in the UK. We expect Government to begin consultation in the first half of 2016;
- We are working with Ofcom and Department for Culture, Media and Sport officials to contribute to the development of the UK negotiating position on the review of the EU regulatory framework for electronic communications, with a focus on ensuring that EU legislation provides for strong levels of consumer protection for services provided from within the EU.

Objective 5: To deliver effective and efficient regulation

Ensuring that our regulation continues to deliver the outcomes for consumers and the industry set out in our Code of Practice.

The launch and application of Code 13 in 2015/16, with its associated special conditions and guidance, has been designed to further embed our outcomes-based approach to regulation. Within this environment, we have also specifically:

- Responded to the challenge at the start of the year of rising complaint numbers relating to competition services and, to a lesser extent, adult services, through extensive analysis of the complaint drivers and the subsequent targeted Rapid Response Team work described above;
- Worked with Ofcom and the Department for Culture, Media and Sport to ensure that the proposed Investigatory Powers Bill will contain measures that preserve our ability to investigate complaints effectively, and agreed an approach that enables our regulatory effectiveness to be maintained as the Bill progresses through Parliament.

Ensuring that we use resources efficiently and provide good value for money.

We have continued during 2015/16 to identify and implement opportunities that yield both material, financial and operational efficiencies:

- We have enhanced our leadership, management and staff capabilities through significant organisational development, including the appointment of a new Chair and Leadership Team. We plan for our Board refresh at the end of the year to contribute towards the financial control of total people costs in 2016/17, and our internal cultural shift programme is being designed to ensure all of our work and structure is fully aligned with our holistic approach to regulation;
- We have successfully completed our office relocation project, saving £0.5m over 8 years;
- We have undertaken a broad range of systems development work, with expected savings to be generated in the 2016/17 financial year;
- We have ensured the primary focus of our contact centre operation has been to collect and analyse market intelligence arising from complaints, and have carefully managed the capacity we need in line with complaint and enquiry levels. We will continue to explore resourcing options, including outsourcing and other automated processes, that best balances our need for timely access to independent market intelligence with the cost of acquiring it;
- We plan to continue to develop our call centre operations by further reviewing our new interactive voice recording in collaboration with industry expertise, to optimise our contact handling and better direct consumers towards appropriate resolution;
- We reviewed and updated our investigators' time recording systems, to enhance the "polluter pays" principle through the better allocation of costs;
- We are currently reviewing the level of contingency provisions held on the PhonepayPlus balance sheet, so that we accurately reflect the financial impact of major risks and identify those exceptional items that should not be funded to the detriment of our capabilities to regulate as planned.

We also continue to ensure we follow best business practices, even where financial and operational efficiencies may be relatively small. Examples during 2015/16 include putting our legal work out to tender, ensuring our staff handbook is fully up to date with current employment legislation, and reviewing our insurance arrangements to best support our ability to act as an independent regulator.

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3.0 CONTACT MANAGEMENT

Overview

We provide professional handling and assessment of all enquires and complaints received, either through automated means (on-line and interactive voice response) or direct contact with consumers.

Our contact management is designed to identify non-compliance or compliance with our Code, through the collection of evidence from consumers, and to prepare the way for further investigation and enforcement where required. We do not seek to provide resolution of individual complaints (consumers are directed back to their network, or the provider of the service, and only to revert to us if they remain unsatisfied), but we will support individuals where appropriate and proportionate in the line of making further regulatory enquiries.

Our broad scope of operations is:

- We receive over 1/4 million contacts from consumers annually, either online (including use of Number Checker) and by telephone;
- We deal with over 80% of these contacts through automated means (as well as Number checker, we use interactive voice response on our phone systems);
- Around 12,000 complaints are received online annually following use of Number Checker;
- We are currently responding to over 40,000 telephone calls per annum; after filtering of enquires, roughly 40% are complaints;
- Total complaints are currently running at nearly 30,000 annually.

Comments

Phone enquiries are declining, we are continuing to experience a disproportionate number of enquiries from customers of Virgin and we are in discussion with them and Ofcom to ensure we resolve this problem.

The proportion of complaints received by phone are at a 4-year peak for the first 3 quarters of this Financial year as compared to the first 3 quarters of previous years.

- The total volume of complaints received by phone is up by 300% since FY2012-13
- The proportion of phone complaints is up by 65%, from 37% of all complaints in FY2012-13 to 61%

The proportion of complaints received by phone has remained relatively stable within the past year, in comparison to previous quarters this year, and the same quarter last financial year.

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3.1 TOTAL CONTACTS

Overview

3.1.1 Contacts per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
All complaints	2,315	2,266	2,522	3,187	3,602	3,814	2,893	2,045	2,028	1,746	1,503	1,717
Phone enquiries	1,207	1,479	1,936	1,811	2,157	2,516	2,931	2,450	2,339	2,297	1,931	1,318
Web enquiries	23,833	21,440	23,586	21,711	21,361	21,913	22,017	18,803	18,396	18,531	16,809	16,106
Total	27,355	25,185	28,044	26,709	27,120	28,243	27,841	23,298	22,763	22,574	20,243	19,141

3.1.2 Contacts per month



Definitions

Complaints: A consumer expression of discontent about a discernable potential CPRS

Phone enquiries: Consumer contacts not related to new Complaints

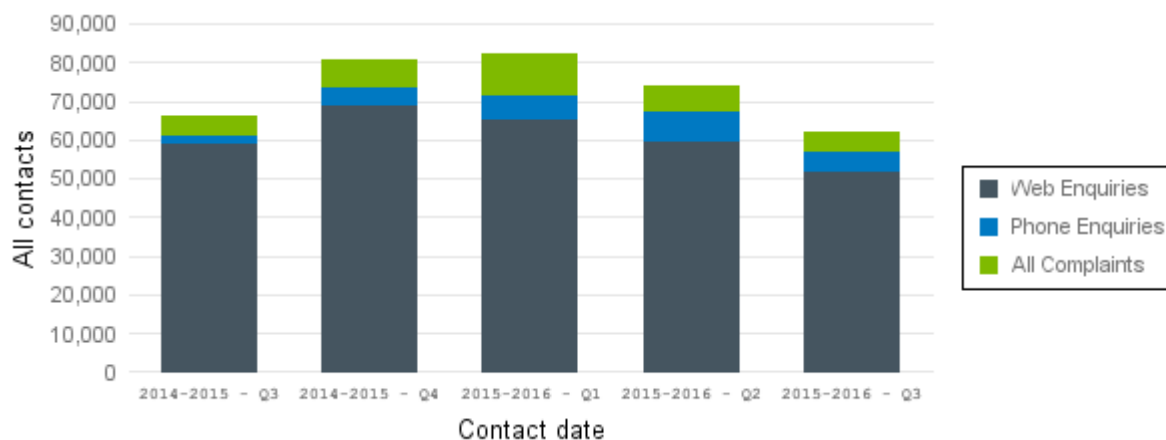
Web enquiries: A web-based form which returns provider information and contact details for a PRS number or shortcode

Quarterly view

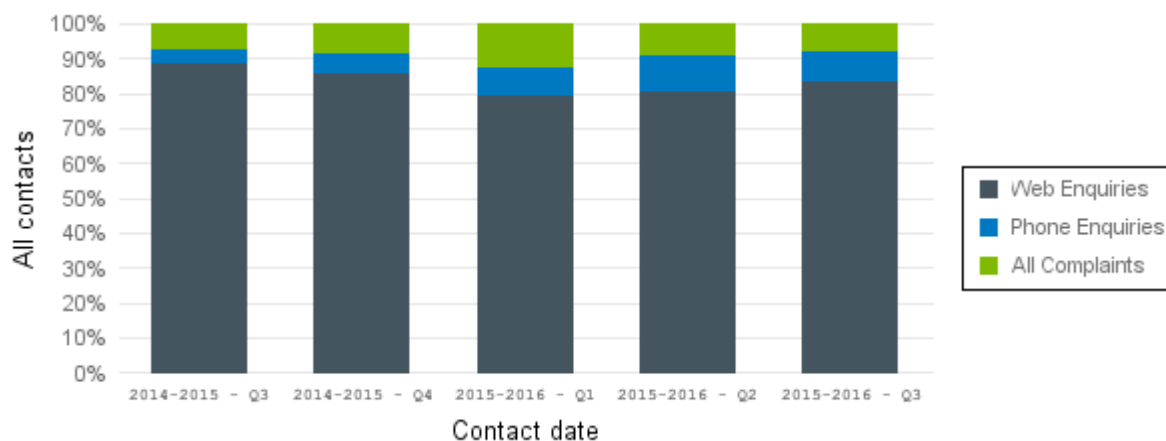
3.1.3 Contacts per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
All complaints	5,115	7.7%	7,103	8.8%	10,603	12.9%	6,966	9.4%	4,966	8.0%
Phone enquiries	2,404	3.6%	4,622	5.7%	6,484	7.9%	7,720	10.4%	5,546	9.0%
Web enquiries	58,606	88.6%	68,859	85.4%	64,985	79.2%	59,216	80.1%	51,446	83.0%
Total	66,125		80,584		82,072		73,902		61,958	

3.1.4 Contacts per quarter (volume)



3.1.5 Contacts per quarter (proportion)

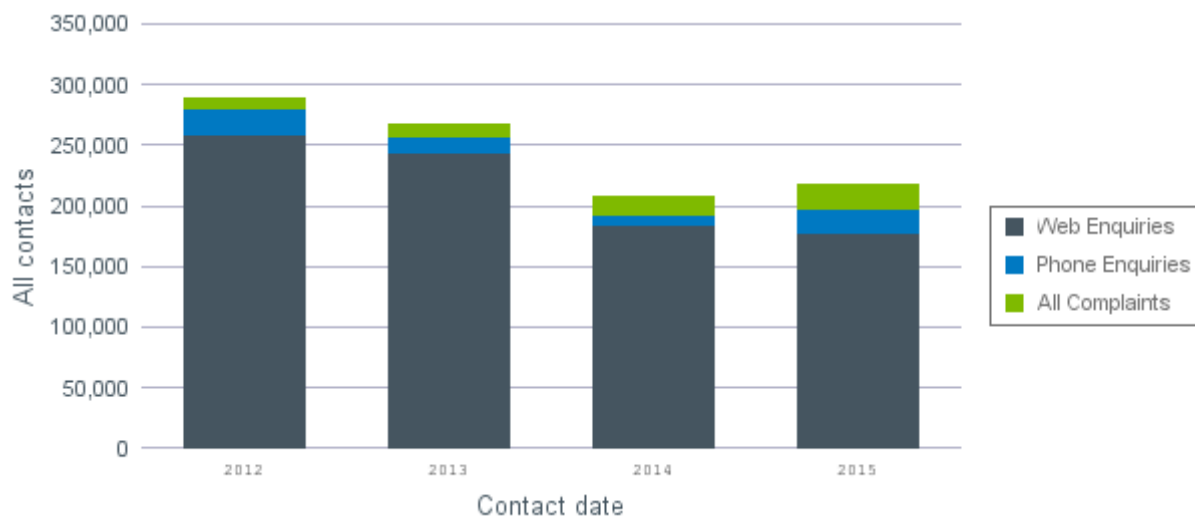


Annual View

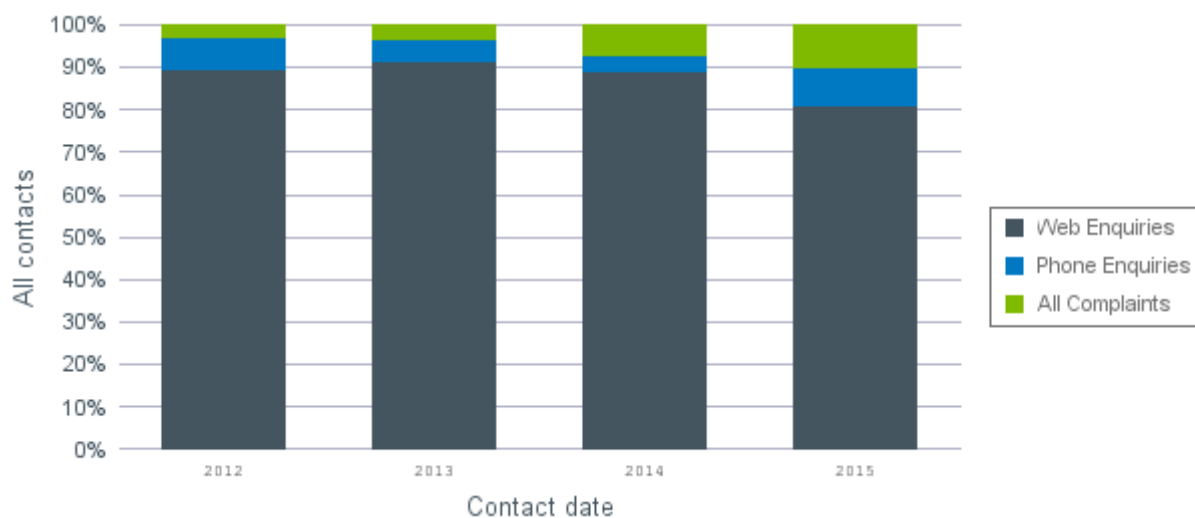
3.1.6 Contacts per Financial year to date (Q1 - Q3 comparable)*

	2012		2013		2014		2015	
All complaints	9,567	3.3%	10,590	4.0%	15,501	7.5%	22,535	10.3%
Phone enquiries	21,305	7.4%	13,168	4.9%	7,810	3.8%	19,750	9.1%
Web enquiries	257,887	89.3%	243,077	91.1%	183,576	88.7%	175,647	80.6%
Total	288,759		266,835		206,887		217,932	

3.1.7 Contacts per Financial year to date (volume)*



3.1.8 Contacts per Financial year to date (proportional)*



*CAPTCHA implementation (2014) led to a reduction in web enquiries

3.2 TOTAL COMPLAINTS

Overview

3.2.1 Complaints by origin per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Phone	1,352	1,178	1,089	1,806	2,126	2,320	2,025	1,272	1,313	1,035	862	1,097
Web	958	1,084	1,431	1,378	1,474	1,494	867	772	709	711	636	618
Other	5	4	2	3	2		1	1	6		5	2
Sum:	2,315	2,266	2,522	3,187	3,602	3,814	2,893	2,045	2,028	1,746	1,503	1,717

3.2.2 Complaints by origin per month



Definitions

Complaint: A single incident of a consumer expression of dissatisfaction with a PRS, or a single monitoring exercise

Phone: Complaints registered by speaking with a call centre operative

Web: Complaints registered over the automated internet complaint form

E-mail: Complaints received electronically via email rather than through the complaint form

Letter: Written complaints received through the post

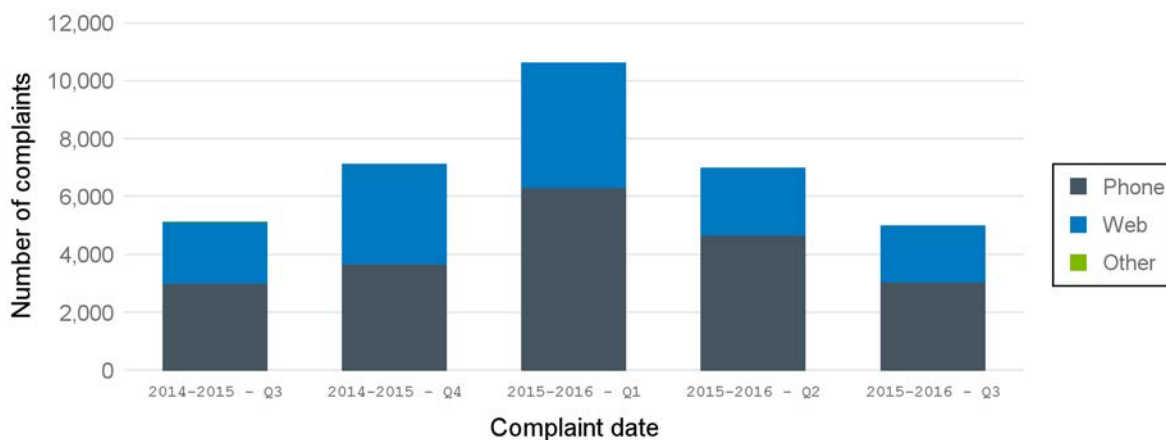
Internal monitoring: Service issues which are brought to our attention by our research team

Quarterly view

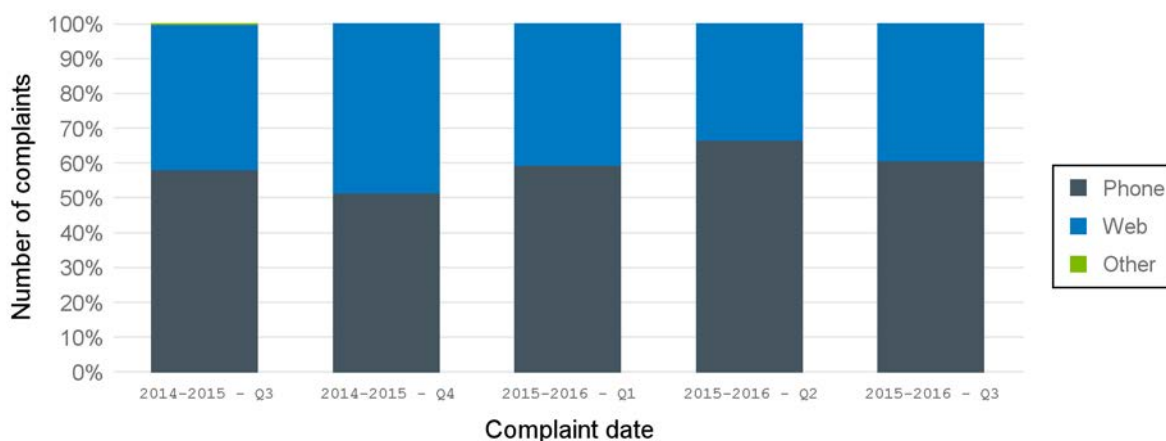
3.2.3 Complaints by origin per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
Phone	2,947	57.6%	3,619	51.0%	6,252	59.0%	4,610	66.2%	2,994	60.3%
Web	2,134	41.7%	3,473	48.9%	4,346	41.0%	2,348	33.7%	1,965	39.6%
Other	32	0.6%	11	0.2%	5	0.0%	8	0.1%	7	0.1%
Sum:	5,113		7,103		10,603		6,966		4,966	

3.2.4 Complaints by origin per quarter (volume)



3.2.5 Complaints by origin per quarter (proportion)



Annual View

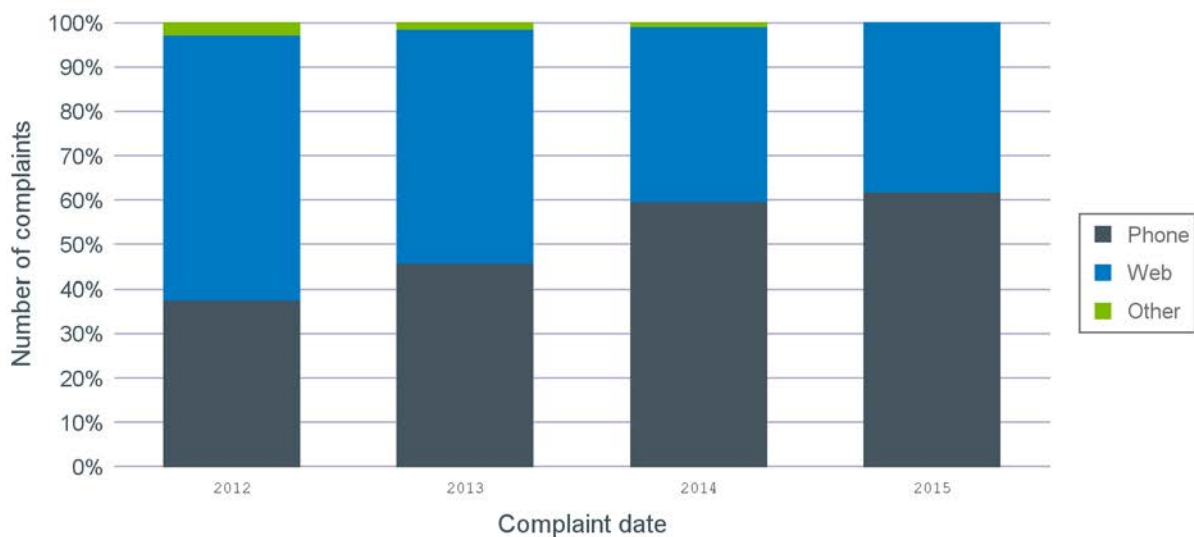
3.2.6 Complaints by origin per Financial year to date (Q1 - Q3 comparable)

	2012		2013		2014		2015	
Phone	3,505	37.2%	4,805	45.4%	9,188	59.3%	13,856	61.5%
Web	5,641	59.8%	5,584	52.7%	6,113	39.4%	8,659	38.4%
Other	288	3.1%	197	1.9%	195	1.3%	20	0.1%
Sum:	9,434		10,586		15,496		22,535	

3.2.7 Complaints by origin per Financial year to date (volume)



3.2.8 Complaints by origin per Financial year to date (proportional)



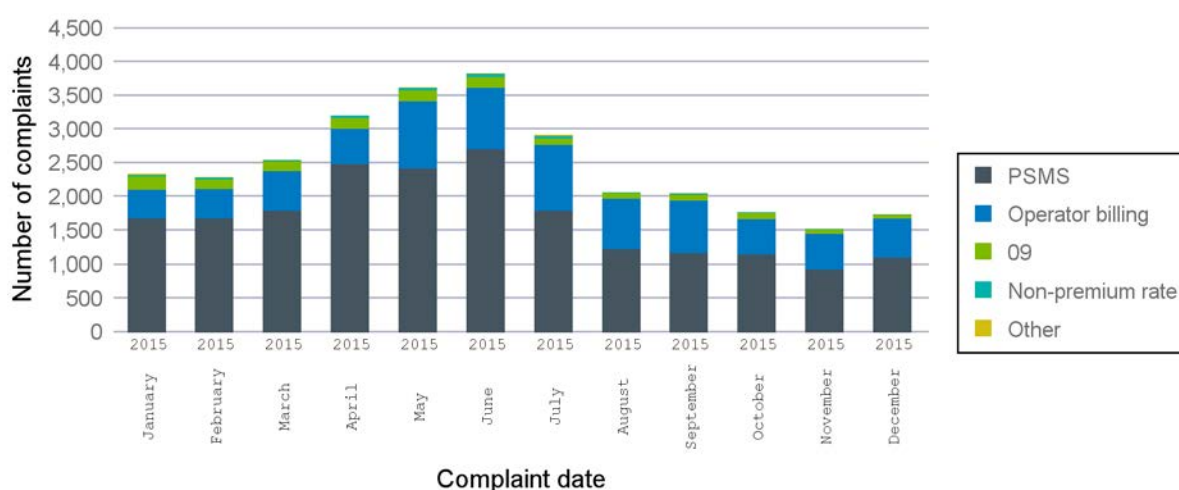
3.3 COMPLAINTS BY PAYMENT MECHANISM

Overview

3.3.1 Complaints by payment mechanism per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
PSMS	1,648	1,647	1,767	2,456	2,390	2,683	1,764	1,194	1,137	1,117	897	1,070
Operator billing	427	443	585	530	1,001	910	983	750	778	528	525	580
09	208	145	145	157	162	164	98	84	91	88	65	50
Non-premium rate	17	28	20	37	42	43	29	13	17	11	11	7
Other	15	3	5	7	7	14	19	4	5	2	5	10
Sum:	2,315	2,266	2,522	3,187	3,602	3,814	2,893	2,045	2,028	1,746	1,503	1,717

3.3.2 Complaints by payment mechanism per month



Definitions

PSMS: Premium short message services

Operator billing: A secure mobile payment service, includes payments via "Payfortit"

09: PR services operating in the Landline sector utilising Non-geographic numbers beginning with 09

087: PR services utilising the 087 number range. Prices range from approx. 5p per minute to 15p per minute. Typical services include Sales booking lines for Hotels and Cinemas

Voice shortcode: PRS services utilising the mobile short numbering system which are designated to carrying voice traffic

DQ: Directory enquiry services

Non-premium rate: Includes legitimate use of 070, own portal services and 084 services

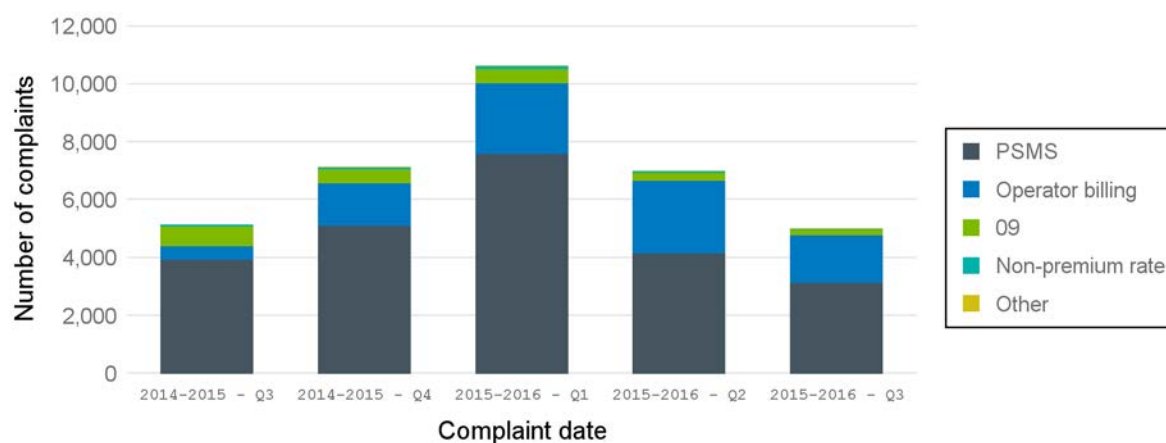
Other: Includes illegitimate use of 070 and general complaints about PRS

Quarterly view

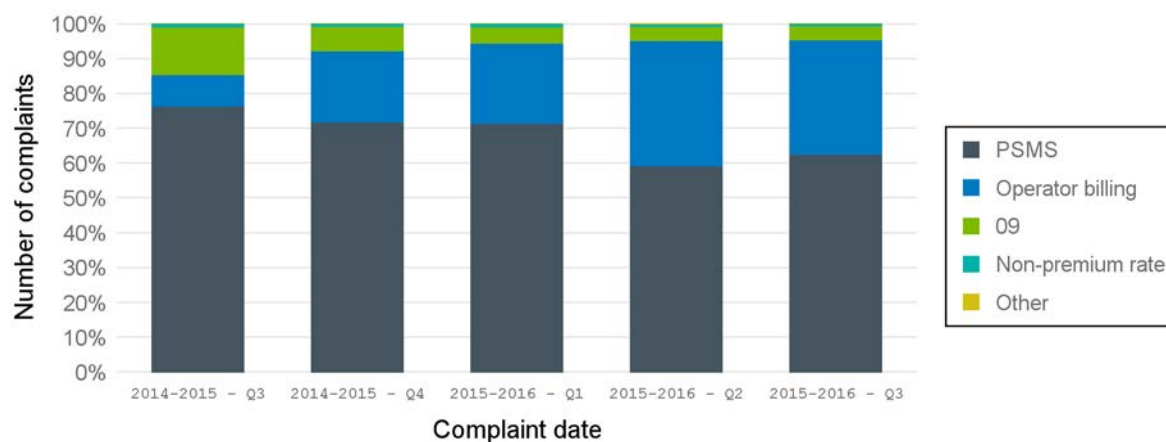
3.3.3 Complaints by payment mechanism per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
PSMS	3,881	75.9%	5,062	71.3%	7,529	71.0%	4,095	58.8%	3,084	62.1%
Operator billing	466	9.1%	1,455	20.5%	2,441	23.0%	2,511	36.0%	1,633	32.9%
09	691	13.5%	498	7.0%	483	4.6%	273	3.9%	203	4.1%
Non-premium rate	60	1.2%	65	0.9%	122	1.2%	59	0.8%	29	0.6%
Other	15	0.3%	23	0.3%	28	0.3%	28	0.4%	17	0.3%
Sum:	5,113		7,103		10,603		6,966		4,966	

3.3.4 Complaints by payment mechanism per quarter (volume)



3.3.5 Complaints by payment mechanism per quarter (proportion)

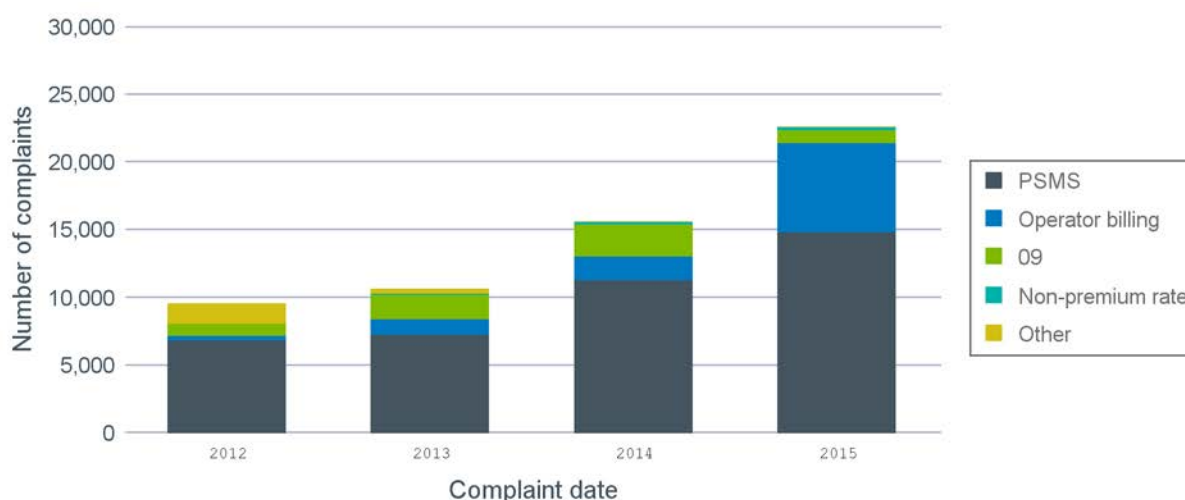


Annual View

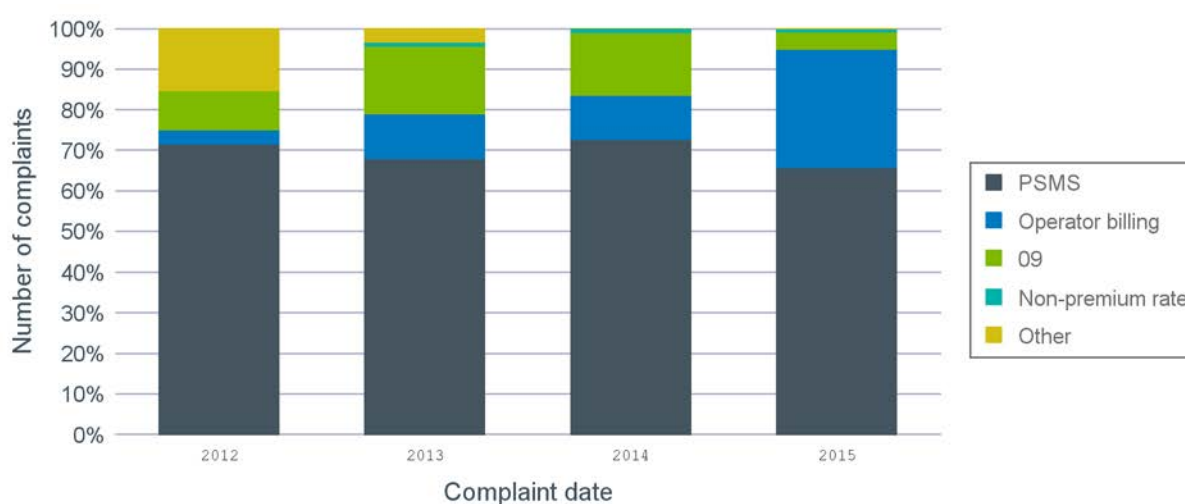
3.3.6 Complaints by payment mechanism per Financial YTD (Q1 - Q3 comparable)

	2012		2013		2014		2015	
PSMS	6,745	71.2%	7,149	67.5%	11,202	72.3%	14,708	65.3%
Operator billing	327	3.5%	1,161	11.0%	1,696	10.9%	6,585	29.2%
09	911	9.6%	1,779	16.8%	2,387	15.4%	959	4.3%
Non-premium rate			108	1.0%	183	1.2%	210	0.9%
Other	1,495	15.8%	389	3.7%	28	0.2%	73	0.3%
Sum:	9,478		10,586		15,496		22,535	

3.3.7 Complaints by payment mechanism per Financial year to date (volume)



3.3.8 Complaints by payment mechanism per Financial year to date (proportional)



4.0 INVESTIGATIONS AND ENFORCEMENT

Overview

We have an outcomes-based Code of Practice, under which we are committed to ensuring we thoroughly investigate cases fairly and prosecute them proportionately.

With our contact management efficiently processing complaint information and market intelligence, some 535 separate cases each year are put forward for further consideration by the investigations and enforcement team, the scope of their activities includes:

- Undertaking detailed further investigations to decide whether cases should be: closed; held under review; resolved informally (Track 1); or resolved formally (Track 2);
- Engaging with service providers to allow them to understand the issues under consideration and respond within reasonable timescales;
- Ensuring there is a clear and robust audit trail for all decisions taken;
- Building complex and comprehensive legal arguments and evidence to bring any case before a Tribunal, balancing robustness with timeliness;
- Dealing with all post-adjudicatory work, including breaches of sanctions and naming cases.

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4.1 TOTAL CASES

Overview

4.1.1 Investigations historical status by month

Month	Status	BoS	DDRAC	EEA Ref	Emerg Proc	IN	IA	Pro'b	Service Review	T1	T2	Appeal	Total
2015-03	Balance	1	0	1	0	9	40	1	192	19	14	0	277
2015-04	Opened	1	0	1	0	0	1	0	1	2	0	0	6
2015-04	Closed	0	0	1	0	0	11	0	4	8	1	0	25
2015-04	Balance	2	0	1	0	9	30	1	189	13	13	0	258
2015-05	Opened	0	0	0	0	0	4	0	7	4	16	0	31
2015-05	Closed	2	0	0	0	0	6	0	0	4	3	0	15
2015-05	Balance	0	0	1	0	9	28	1	196	13	26	0	274
2015-06	Opened	0	1	0	0	0	7	2	8	6	2	0	26
2015-06	Closed	0	0	0	0	0	5	1	0	5	1	0	12
2015-06	Balance	0	1	1	0	9	30	2	204	14	27	0	288
2015-07	Opened	0	0	0	0	0	13	0	19	3	4	0	39
2015-07	Closed	0	0	0	0	0	2	0	0	4	2	0	8
2015-07	Balance	0	1	1	0	9	41	2	223	13	29	0	319
2015-08	Opened	1	0	0	0	0	7	0	3	0	0	0	11
2015-08	Closed	0	0	0	0	0	2	2	0	5	0	0	9
2015-08	Balance	1	1	1	0	9	46	0	226	8	29	0	321
2015-09	Opened	1	0	0	0	0	7	0	4	0	0	0	12
2015-09	Closed	0	0	0	0	0	7	0	0	2	2	0	11
2015-09	Balance	2	1	1	0	9	46	0	230	6	27	0	322
2015-10	Opened	1	0	1	0	0	2	0	5	1	1	0	11
2015-10	Closed	2	0	0	0	0	3	0	1	3	1	0	10
2015-10	Balance	1	1	2	0	9	45	0	234	4	27	0	323
2015-11	Opened	1	0	0	0	0	2	2	0	1	0	0	6
2015-11	Closed	1	1	0	0	0	3	0	0	1	0	0	6
2015-11	Balance	1	0	2	0	9	44	2	234	4	27	0	323
2015-12	Opened	0	0	0	0	0	3	1	0	0	0	0	4
2015-12	Closed	0	0	0	0	0	0	0	0	0	1	0	1
2015-12	Balance	1	0	2	0	9	47	3	234	4	26	0	326

Definitions

BoS [Breach of Sanction]: A case based on a breach of a sanction (such as non-payment of a fine) by a Provider

DDRAC: A type of track 2 case which focuses on the due diligence responsibilities of Level 1 providers or networks

EEA Referral: A case relating to a Provider based in the EU subject to the referral procedure

Emergency procedure: A procedure which results in interim measures being enforced against a provider with a subsequent hearing on the issues

Informal Notification: An investigation resolved by the Provider without the need for a Track 1 or Track 2

Initial Assessment: Detailed service information being requested from the Level 1 or Level 2 providers as per paragraph 4.2.3 of the Code

Prohibition: A sanction under the Code resulting in an enforced period of prohibition from operating PRS

Service Review: Services subject to ongoing monitoring

Track 1: Enforcement action resulting in an agreed action plan to remedy the breach

Track 2: Enforcement action resulting in a Tribunal decision

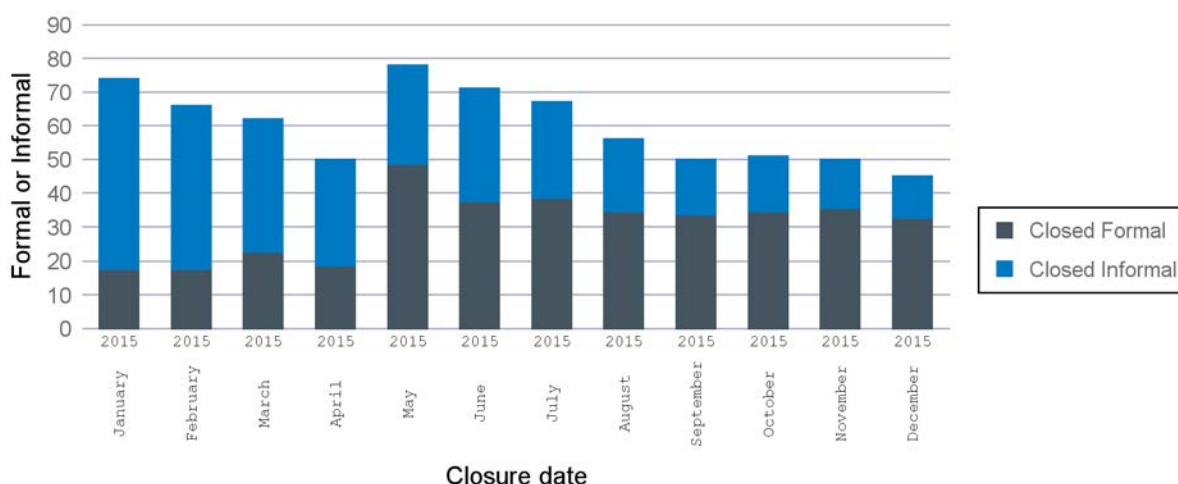
Appeal: Following a tribunal decision the Provider has requested a review or oral hearing

Overview

4.1.2 Investigations closed by enforcement action type per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Formal	1	3	1	1	5	2	2	2	2	3	2	1
Informal	5	16	8	24	10	10	6	7	9	7	4	0
Total Closed	6	19	9	25	15	12	8	9	11	10	6	1

4.1.3 Investigations closed by enforcement action type per month



Definitions

Enforcement action: An Investigation of a provider or service, either formal or informal, regarding potential breaches of code

Formal: An investigation of potentially serious breaches which require may a tribunal or legal action

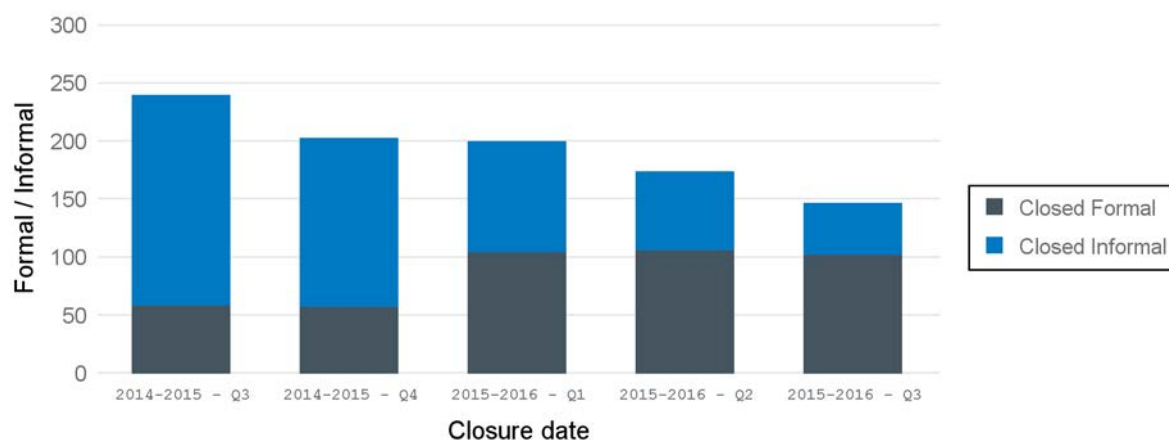
Informal: A resolution not utilising a formal route, includes Track 1 resolution and agreed resolution

Quarterly view

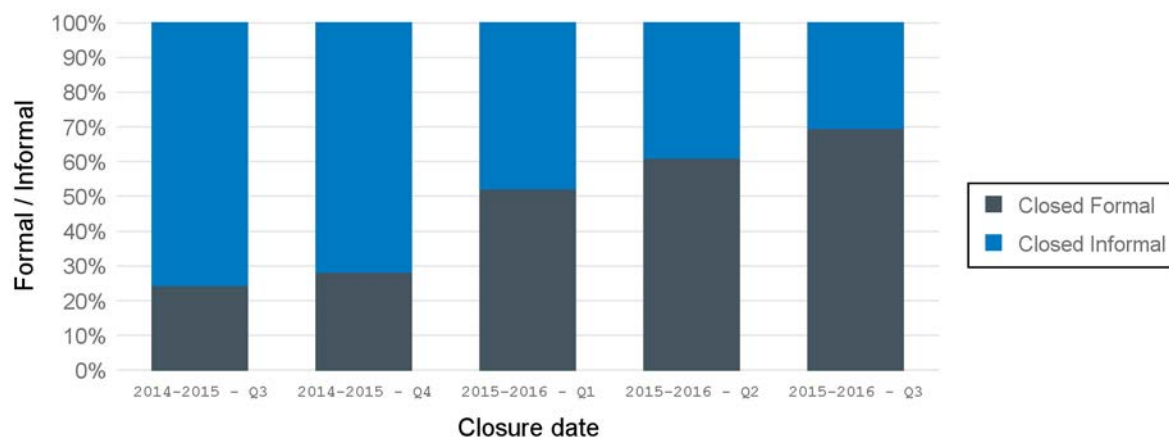
4.1.4 Investigations closed by enforcement action type per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
Formal	12	36.4%	5	14.7%	8	32.0%	6	35.3%	6	60.0%
Informal	21	63.6%	29	85.3%	17	68.0%	11	64.7%	4	40.0%
Total closed	33		34		25		17		10	

4.1.5 Investigations closed by enforcement action type per quarter (volume)



4.1.6 Investigations closed by enforcement action type per quarter (proportion)



Annual View

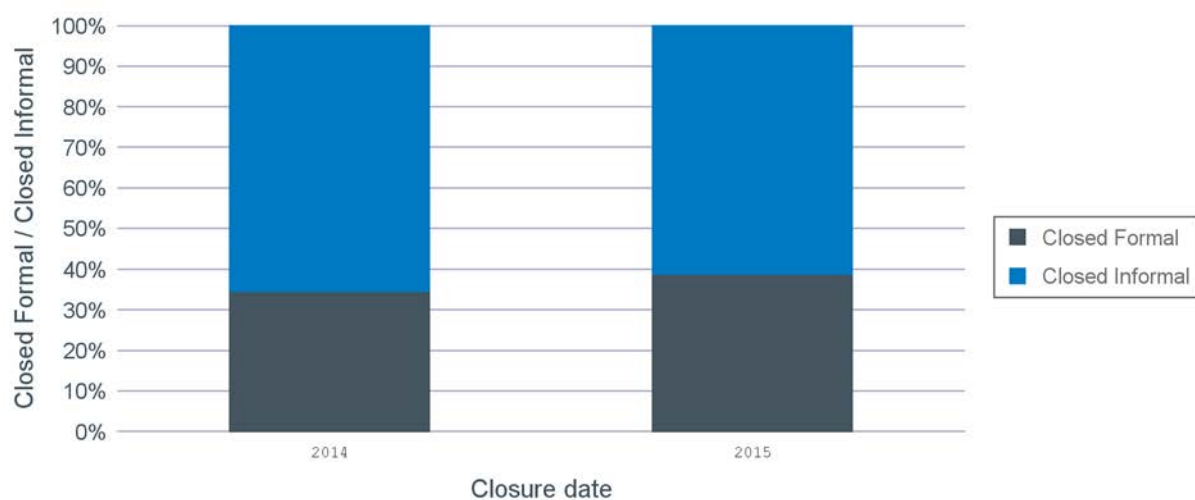
4.1.7 Investigations closed by enforcement action type per FYTD (Q1 - Q3 comparable)

	2014		2015	
Formal	39	34.2%	20	38.5%
Informal	75	65.8%	32	61.5%
Sum:	114		52	

4.1.8 Investigations closed by enforcement action type per FY to date (volume)



4.1.9 Investigations closed by enforcement action type per FY to date (proportional)



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4.2 TRIBUNAL INFORMATION

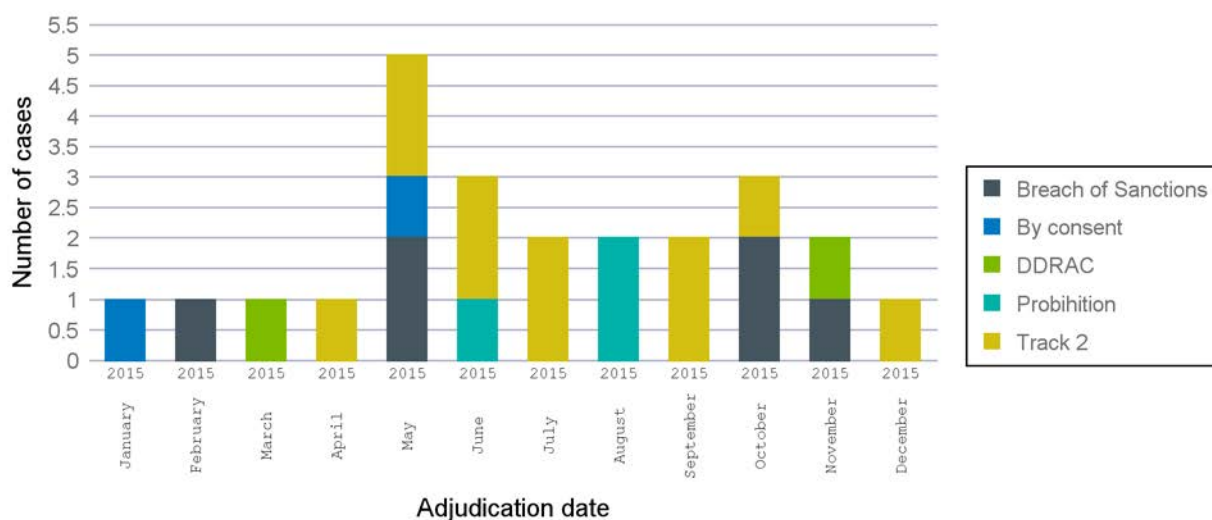
INVESTIGATIONS AND ENFORCEMENT 4.2 Tribunal information

Overview

4.2.1 Number of cases heard at Tribunal

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Breach of Sanctions		1			2					2	1	
By consent	1				1							
DDRAC			1								1	
Prohibition						1		2				
Track 2				1	2	2	2		2	1		1
Sum	1	1	1	1	5	3	2	2	2	3	2	1

4.2.2 Number of cases heard at tribunal per month



Definitions

Breach of Sanctions: A case based on a breach of a sanction (such as non-payment of a fine) by a Provider

By consent: A resolution agreed between the PhonepayPlus board and the respondent, before or after a first instance decision, only available via the oral hearing route

DDRAC: A type of track 2 case which focuses on the due diligence responsibilities of Level 1 providers or networks

Emergency procedure: A procedure which results in interim measures being enforced against a provider with a subsequent hearing on the issues

Oral hearing: A hearing where the Provider makes oral representations in addition to written submissions

Prohibition: A sanction under the Code resulting in an enforced period of prohibition from operating PRS

Review: A tribunal decision that varies a first instance decision by a previous tribunal

Track 2: Enforcement action resulting in a Tribunal decision

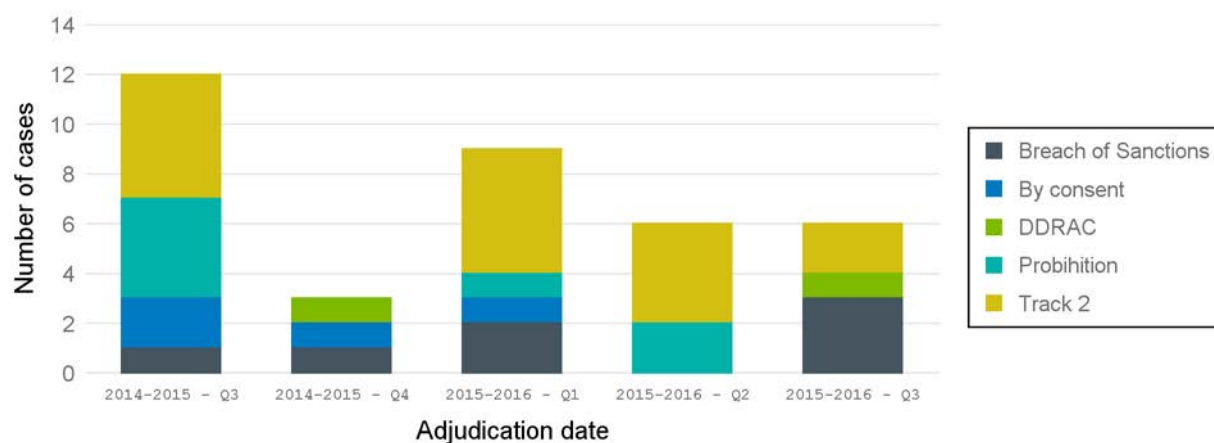
INVESTIGATIONS AND ENFORCEMENT 4.2 Tribunal information

Quarterly view

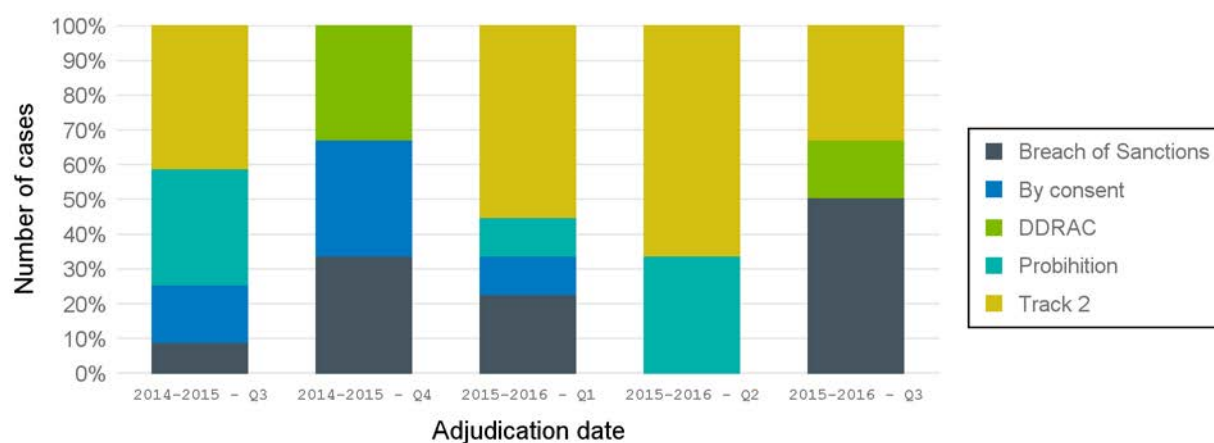
4.2.3 Number of cases heard at tribunal per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
Breach of sanctions	1	8.3%	1	33.3%	2	22.2%			3	50.0%
By consent	2	16.7%	1	33.3%	1	11.1%				
DDRAC			1	33.3%					1	16.7%
Prohibition	4	33.3%			1	11.1%	2	33.3%		
Track 2	5	41.7%			5	55.6%	4	66.7%	2	33.3%
Sum	12		3		9		6		6	

4.2.4 Number of cases heard at tribunal per quarter (volume)



4.2.5 Number of cases heard at tribunal per quarter (proportion)



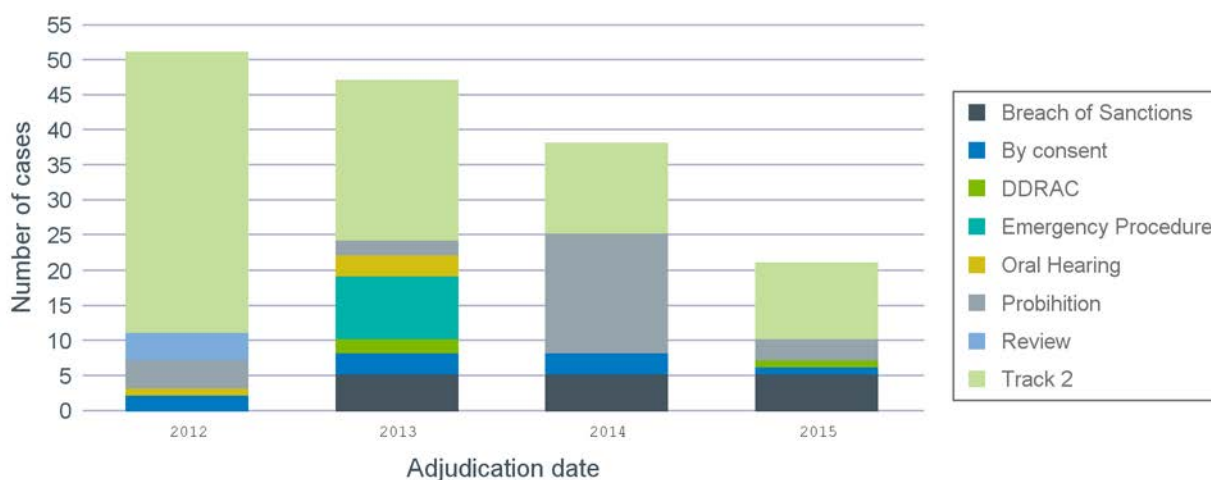
INVESTIGATIONS AND ENFORCEMENT 4.2 Tribunal information

Annual View

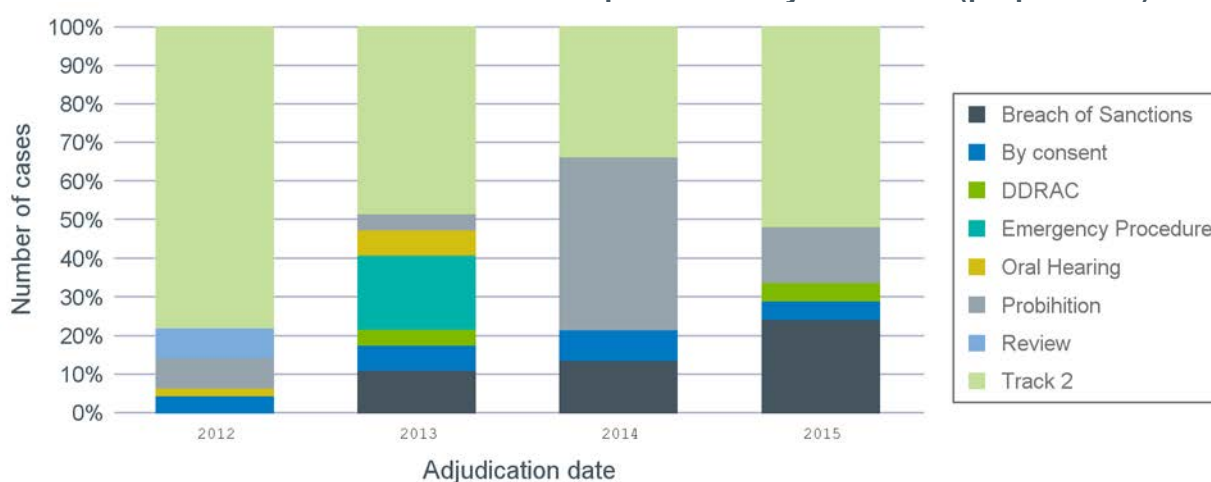
4.2.6 Number of cases heard at tribunal per financial year to date (Q1 - Q3 comparable)

	2012		2013		2014		2015	
Breach of sanctions			5	10.6%	5	13.2%	5	23.8%
By consent	2	3.9%	3	6.4%	3	7.9%	1	4.8%
DDRAC			2	4.3%			1	4.8%
Emergency Procedure			9	19.1%				
Oral Hearing								
Prohibition	1	2.0%	3	6.4%				
Review	4	7.8%	2	4.3%	17	44.7%	3	14.3%
Track 2	4	7.8%						
Track 2	40	78.4%	23	48.9%	13	34.2%	11	52.4%
Sum:	51		47		38		21	

4.2.7 Number of cases heard at tribunal per financial year to date (volume)



4.2.8 Number of cases heard at tribunal per financial year to date (proportional)



4.3 TRACK 2 BREACH SEVERITY

INVESTIGATIONS AND ENFORCEMENT 4.3 Track 2 breach severity

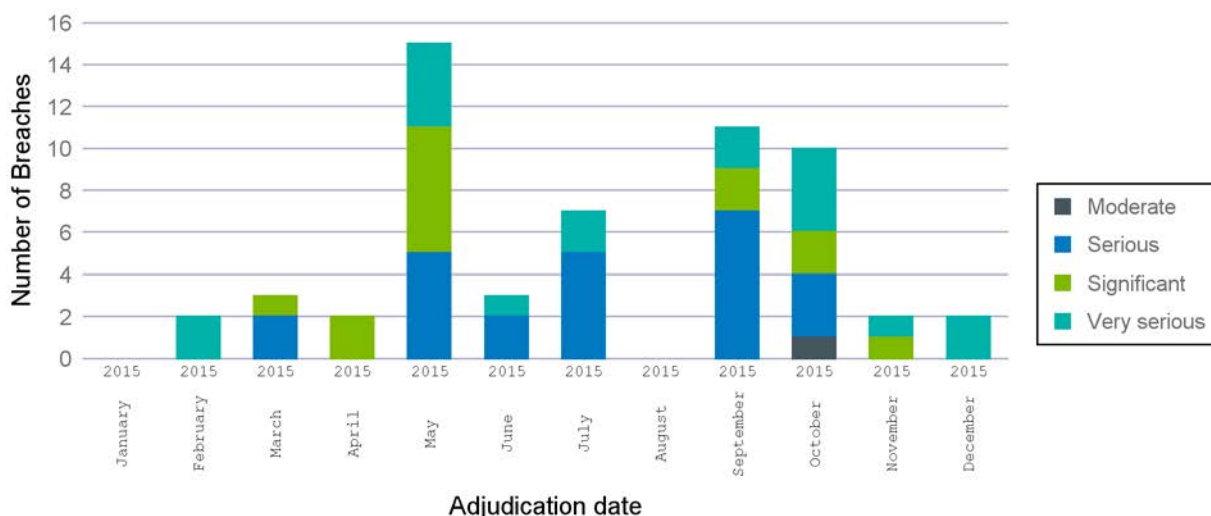
Overview

4.3.1 Upheld breaches by severity per month*

	2014	2014	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Nov	Dec	Feb	Mar	Apr	May	Jun	Jul	Sep	Oct	Nov	Dec
Moderate										1		
Serious	8	3		2		5	2	5	7	3		
Significant	1			1	2	6			2	2	1	
Very serious	2	4	2			4	1	2	2	4	1	2
Sum:	11	7	2	3	2	15	3	7	11	10	2	2

*During January and August there were no upheld breaches

4.3.2 Upheld breaches by severity per month



Definitions

Minor: A rating applied to tribunal decisions, the lowest level of harm on a scale of 1-5

Moderate: A rating applied to tribunal decisions, the second lowest level of harm on a scale of 1-5

Significant: A rating applied to tribunal decisions, the third lowest level of harm on a scale of 1-5

Serious: A rating applied to tribunal decisions, the second highest level of harm on a scale of 1-5

Very serious: A rating applied to tribunal decisions, the highest level of harm on a scale of 1-5

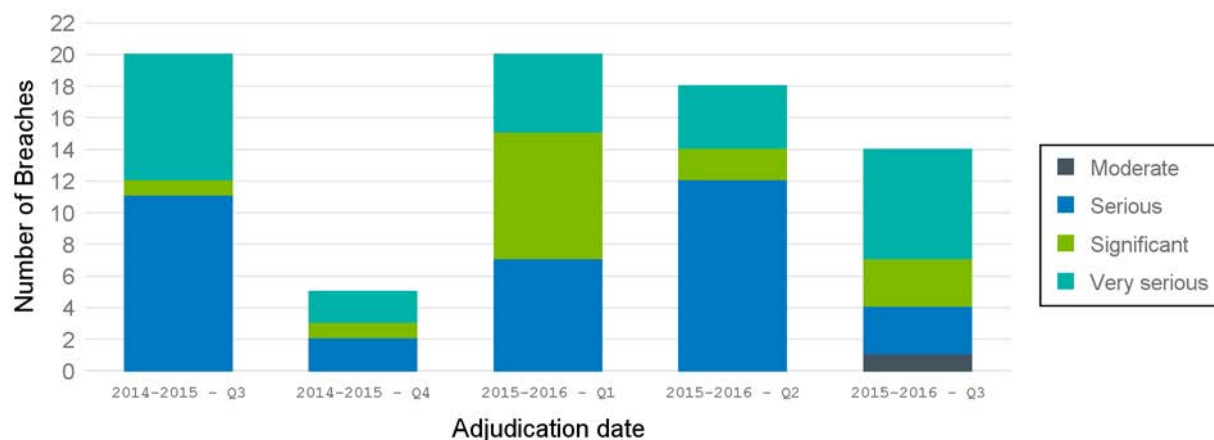
INVESTIGATIONS AND ENFORCEMENT 4.3 Track 2 breach severity

Quarterly view

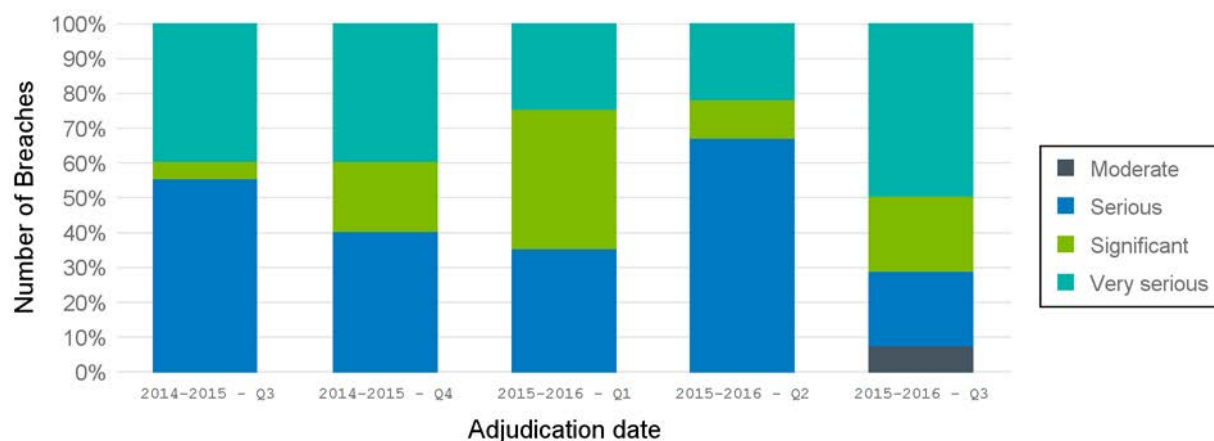
4.3.3 Upheld breaches by severity per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
Moderate									1	7.1%
Serious	11	55.0%	2	40.0%	7	35.0%	12	66.7%	3	21.4%
Significant	1	5.0%	1	20.0%	8	40.0%	2	11.1%	3	21.4%
Very serious	8	40.0%	2	40.0%	5	25.0%	4	22.2%	7	50.0%
Sum:	20		5		20		18		14	

4.3.4 Upheld breaches by severity per quarter (volume)



4.3.5 Upheld breaches by severity per quarter (proportion)



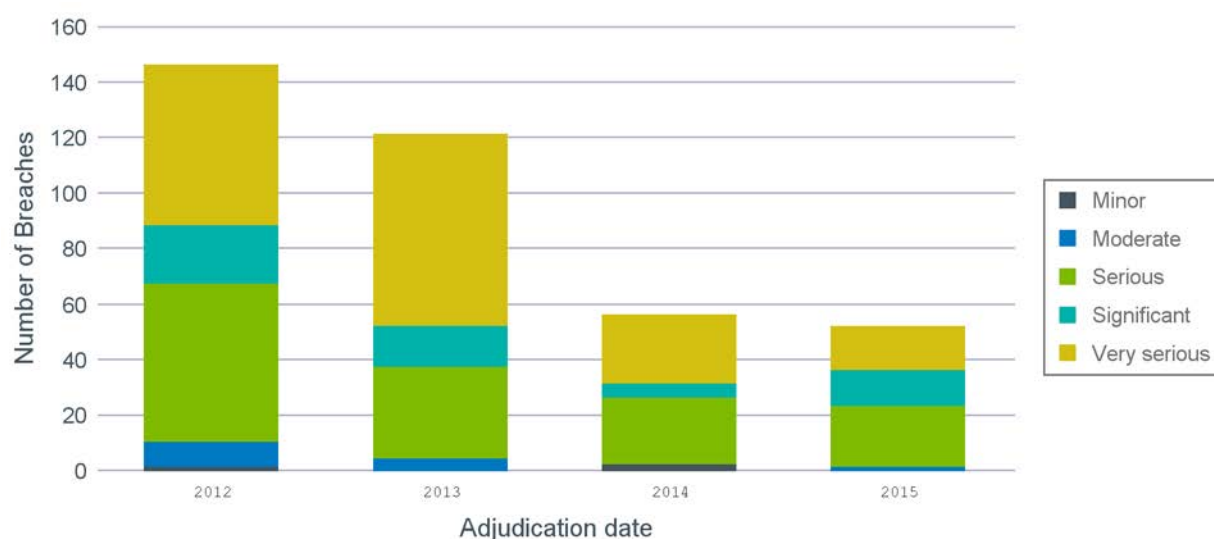
INVESTIGATIONS AND ENFORCEMENT 4.3 Track 2 breach severity

Annual View

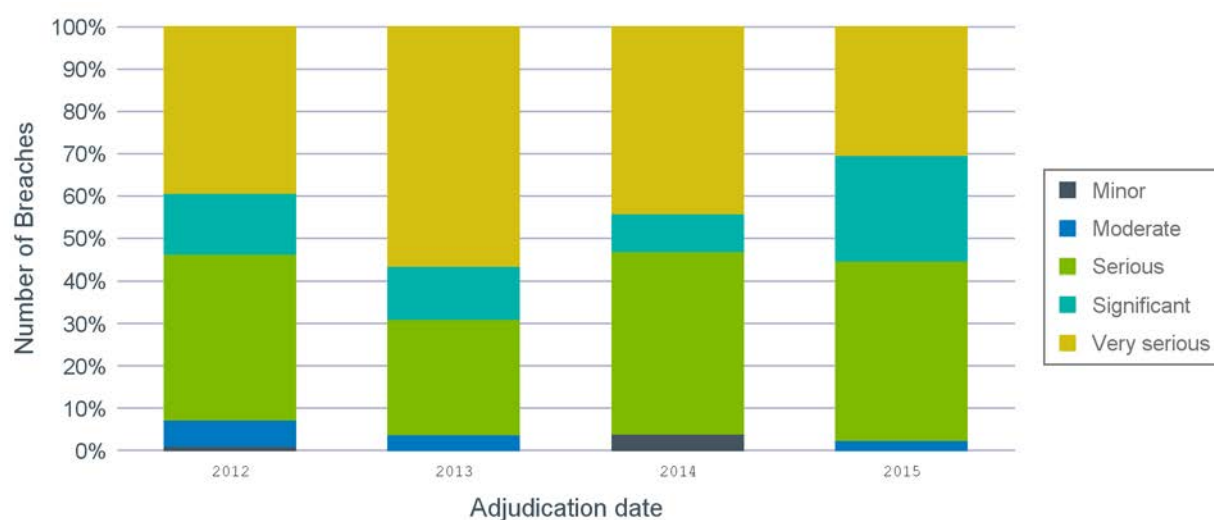
4.3.6 Upheld breaches per financial year to date (Q1-Q3 comparable)

	2012		2013		2014		2015	
Minor	1	0.7%			2	3.6%		
Moderate	9	6.2%	4	3.3%			1	1.9%
Serious	57	39.0%	33	27.3%	24	42.9%	22	42.3%
Significant	21	14.4%	15	12.4%	5	8.9%	13	25.0%
Very serious	58	39.7%	69	57.0%	25	44.6%	16	30.8%
Sum:	146		121		56		52	

4.3.7 Upheld breaches by severity per Financial year to date (volume)



4.3.8 Upheld breaches by severity per Financial year to date (proportional)



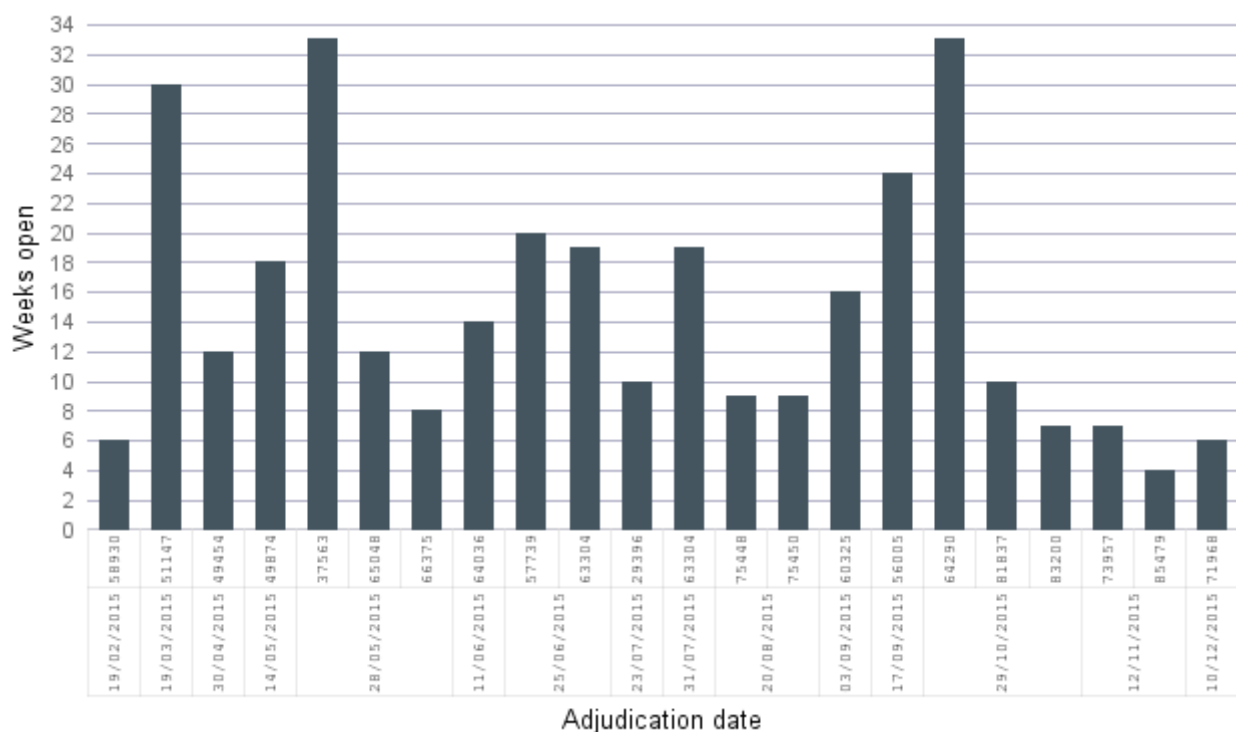
4.4 TRACK 2 DURATION

Overview

4.4.1 Average Track 2 duration per month (weeks)

2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
NA	6	30	12	18	18	14	9	20	17	5	6

4.4.2 Duration for each Track 2 case for the past year (by reference number)



Definitions

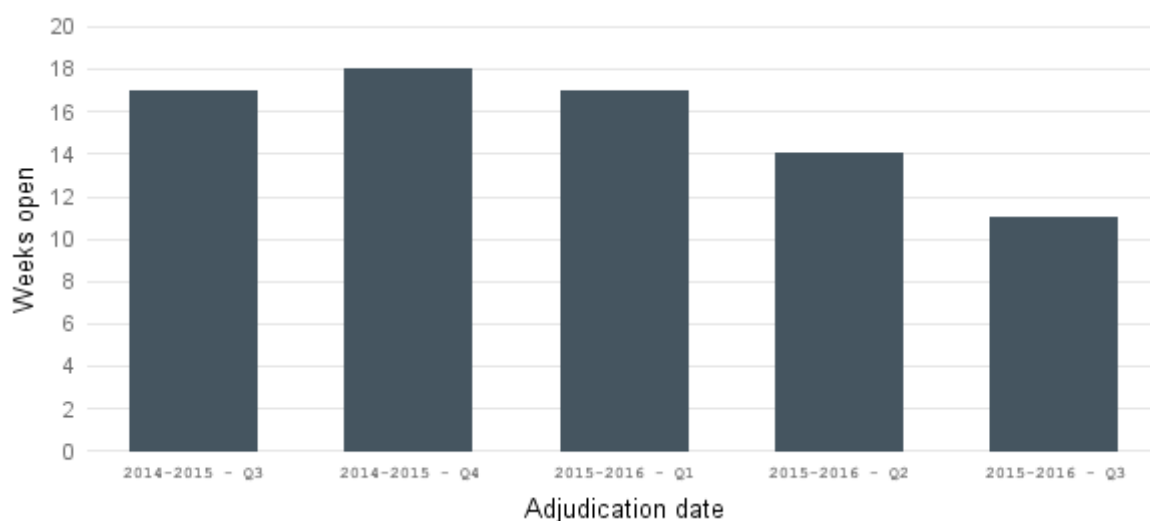
Adjudication date: The date of the decision made by the Code Compliance Panel relating to potential breaches of the Code

Quarterly view

4.4.3 Average Track 2 duration per quarter (weeks)

2014-2015 - Q3	2014-2015 - Q4	2015-2016 - Q1	2015-2016 - Q2	2015-2016 - Q3
17	18	17	14	11

4.4.4 Average Track 2 duration per quarter (weeks)

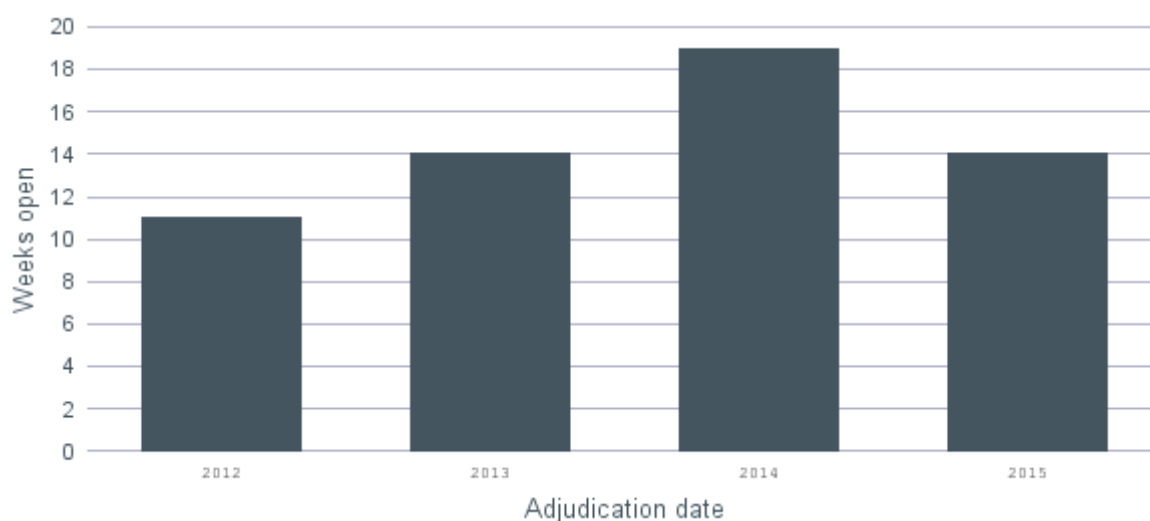


Annual view

4.4.5 Average Track 2 duration per Financial year to date (weeks) (Q1 - Q3 comparable)

2012	2013	2014	2015
11	14	19	14

4.4.6 Average Track 2 duration per Financial year to date (weeks)



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5.0 INDUSTRY SUPPORT

Overview

In addition to our investigatory and enforcement work, our regulatory toolkit also includes identifying and applying policy solutions to issues arising more generally in the market. The scope of the industry support we are able to provide includes:

- Holding our Code of Practice and supporting procedures to constant review, and updating guidance around these as necessary;
- Responding to requests for compliance advice;
- Providing the facility for industry Due Diligence Risk Assessment and Control to be undertaken;
- Commissioning industry-wide research initiatives;
- Finding ways in which barriers to high compliance can be broken down. These include working with an expanded and enhanced Industry Liaison Panel; making effective use of its Rapid Response Team mechanism where required; and our detailed programme of one-to-one meetings and engagement with industry representative bodies, network operators and service providers.

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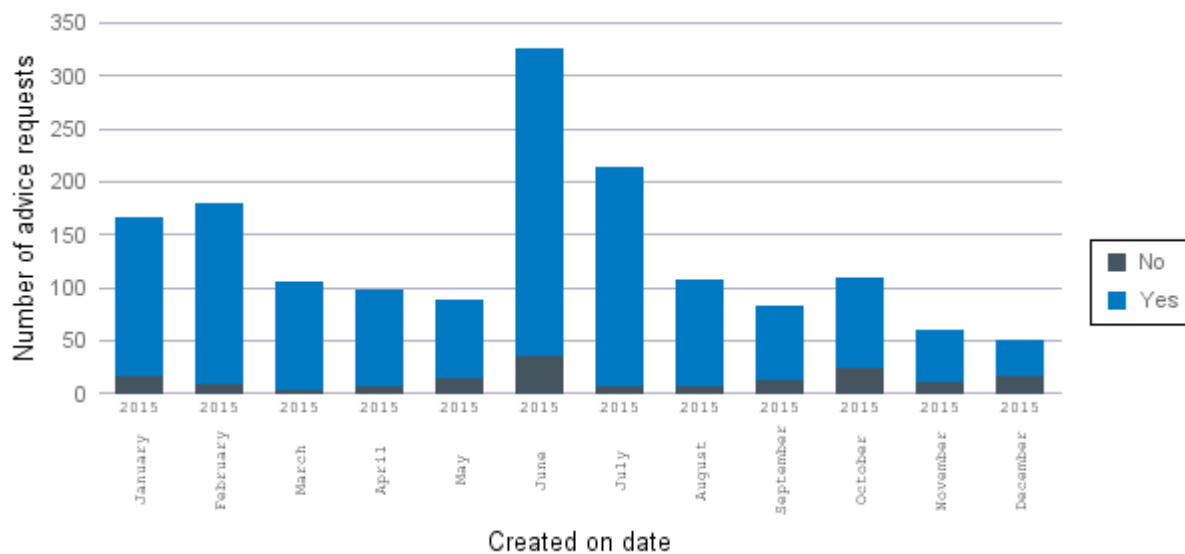
5.1 COMPLIANCE ADVICE

Overview

5.1.1 Compliance advice given (within five days)

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
No	16	8	2	6	15	35	7	6	12	24	10	16
Yes	149	172	104	92	74	290	207	102	70	85	50	35
Sum:	165	180	106	98	89	325	214	108	82	109	60	51

5.1.2 Compliance advice given (within five days)



Definitions

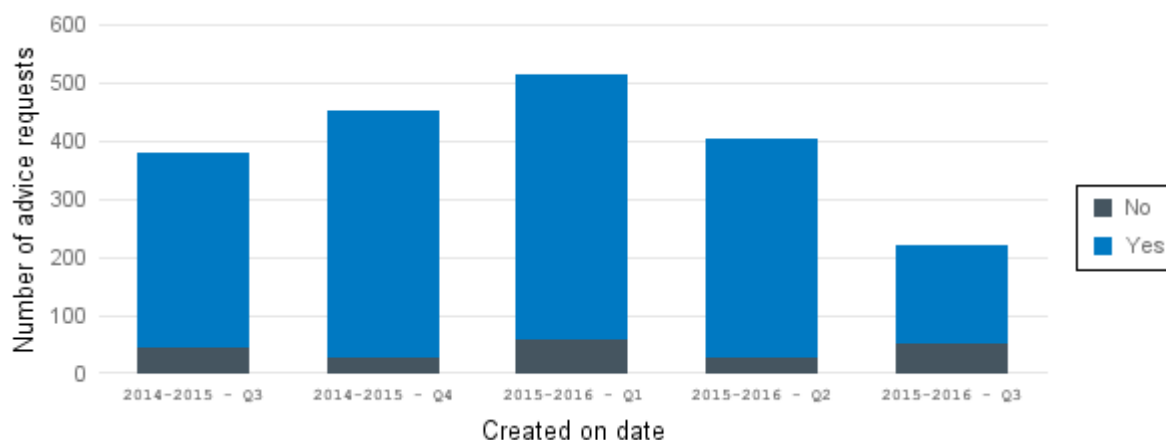
Compliance advice: A written piece of advice on how to operate PRS within the scope of the Code of Practice

Quarterly view

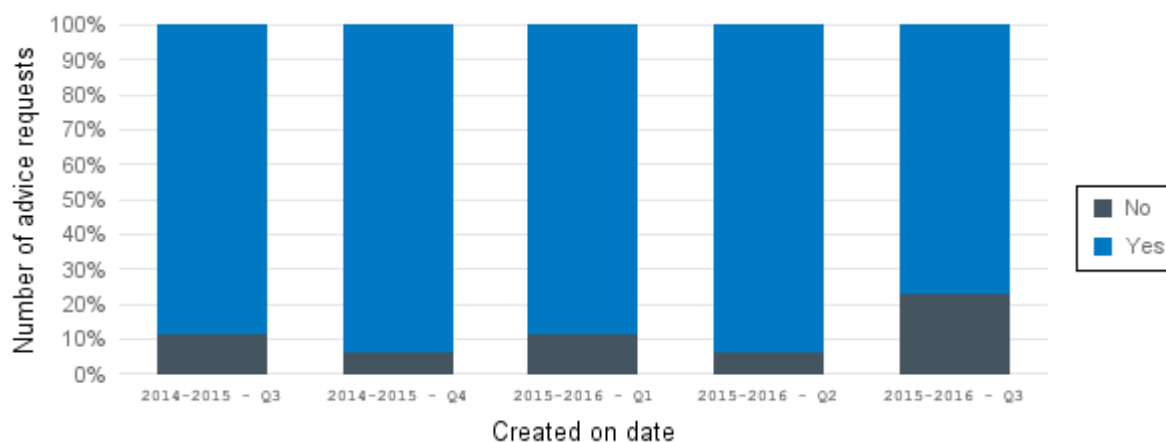
5.1.3 Compliance advice requests answered within 5 working days per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
No	42	11.1%	26	5.8%	56	10.9%	25	6.2%	50	22.7%
Yes	337	88.9%	425	94.2%	456	89.1%	379	93.8%	170	77.3%
Sum:	379		451		512		404		220	

5.1.4 Requests answered within 5 working days per quarter (volume)



5.1.5 Requests answered within 5 working days per quarter (proportion)

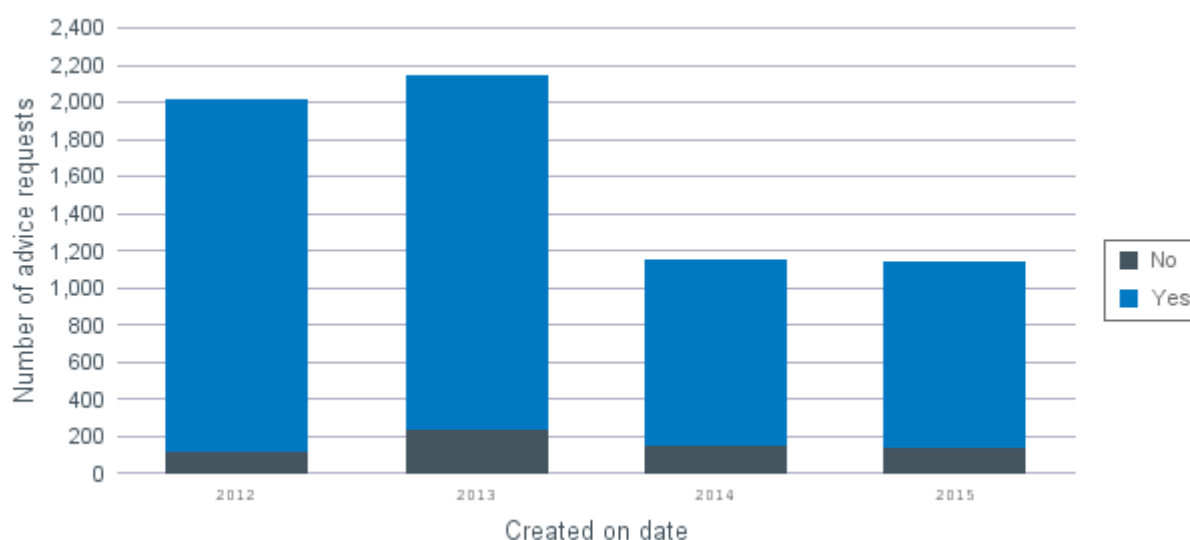


Annual View

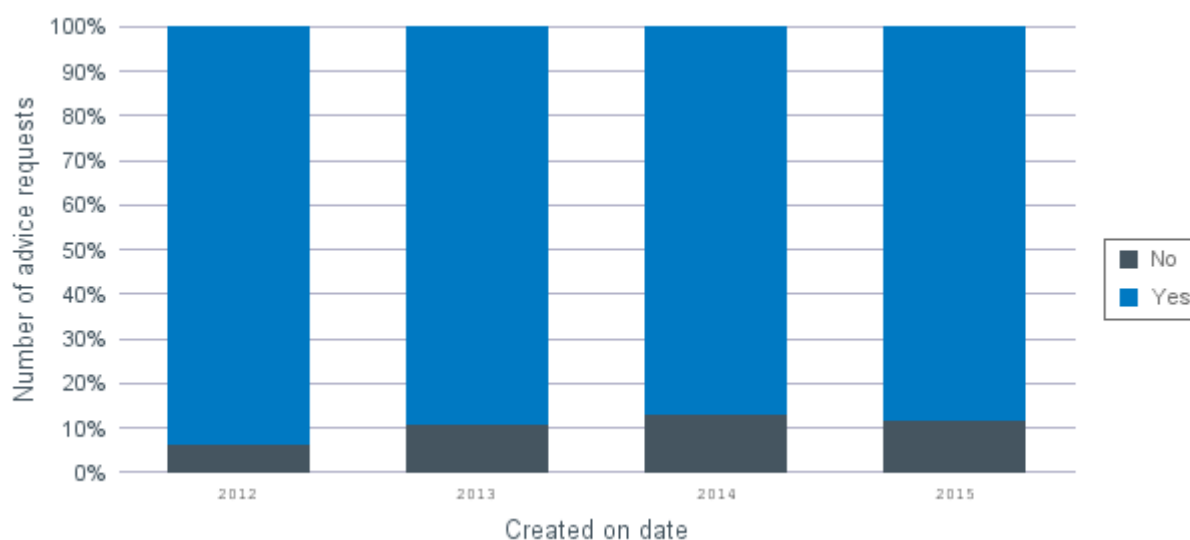
5.1.6 Compliance advice requests answered within 5 working days per Financial YTD (Q1 - Q3 comparable)

	2012		2013		2014		2015	
No	117	5.8%	228	10.6%	149	12.9%	131	11.5%
Yes	1,892	94.2%	1,915	89.4%	1,003	87.1%	1,005	88.5%
Sum:	2,009		2,143		1,152		1,136	

5.1.7 Requests answered within 5 working days per Financial YTD (volume)



5.1.8 Requests answered within 5 working days per Financial YTD (proportional)



5.2 DUE DILLIGENCE

Overview

5.2.1 Number of due diligence requests per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Unique checks	265	244	201	245	197	194	311	294	267	191	204	155
Requesting Orgs	56	50	44	48	37	40	46	34	39	36	40	30
Target Orgs	211	200	168	167	167	166	245	240	228	168	178	136

5.2.1 Number of due diligence requests per month



Definitions

Due diligence request: Background checks that networks are required to carry out on potential providers

Unique checks: A unique incidence of a due diligence request between one target and one requesting organisation

Requesting organisations: The network or Level 1 provider carrying out the due diligence on a potential provider

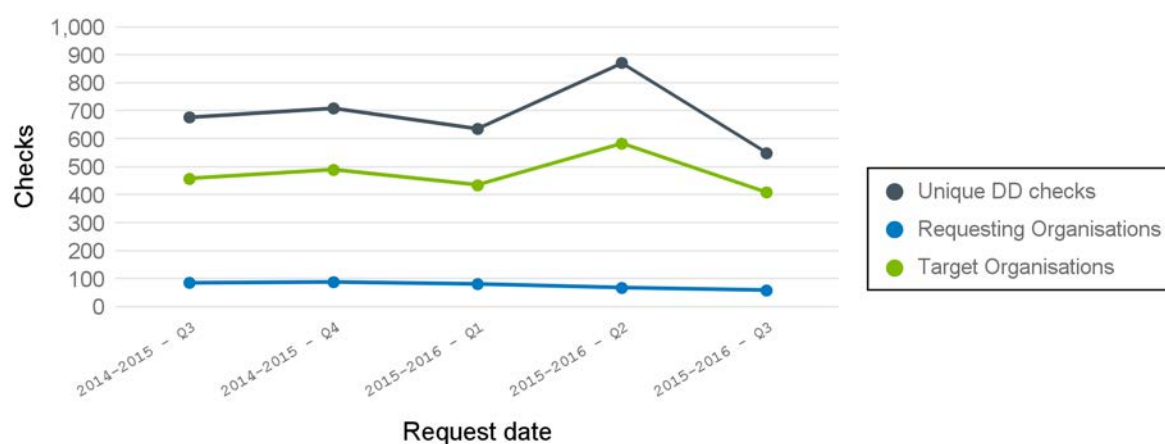
Target organisations: The potential provider being evaluated

Quarterly view

5.2.3 Number of due diligence requests per quarter

	2014-2015 - Q3	2014-2015 - Q4	2015-2016 - Q1	2015-2016 - Q2	2015-2016 - Q3
Unique checks	677	710	636	872	550
Requesting Orgs	86	89	82	69	60
Target Orgs	459	491	436	585	409

5.2.4 Number of due diligence requests per quarter (volume)

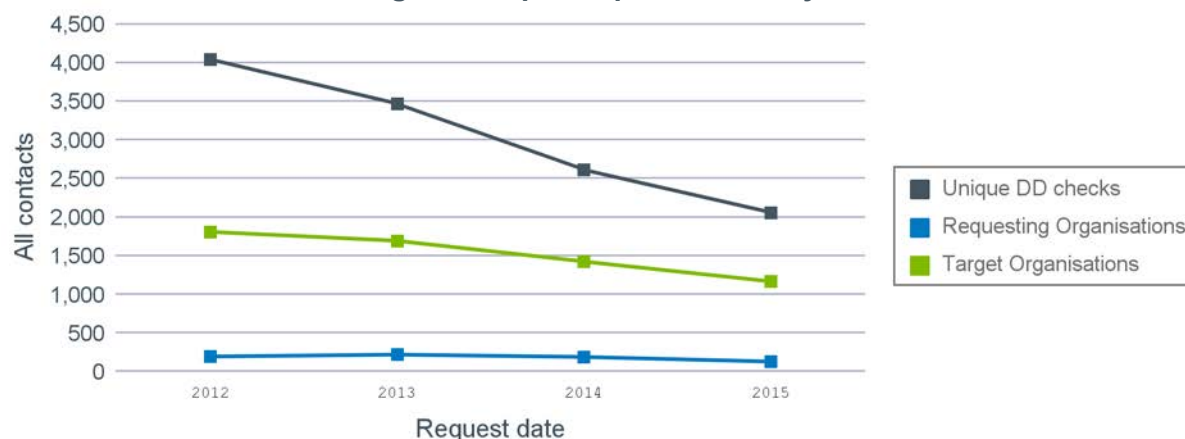


Annual View

5.2.5 Number of due diligence requests per Financial YTD (Q1 - Q3 comparable)

	2012	2013	2014	2015
Unique checks	4,043	3,467	2,612	2,058
Requesting Orgs	195	219	189	129
Target Orgs	1,809	1,693	1,424	1,166

5.2.6 Number of due diligence requests per Financial year to date



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6.0 MARKET CONTEXT

Overview

Through the nature of our operations and the data we collect, we are able to provide an authoritative overview of the PRS market:

- The financial size of the PRS market is measured initially through the revenues collected by network operators, and then through the outpayments they make to aggregators after retaining their share of the value chain. It is to the outpayments figure that the industry levy is applied.
- Compliance with our Code of Practice includes automatic registration of services, although we provide financial exemptions for small businesses and charities. Through this we are able to demonstrate the number of organisations engaged in the provision of PRS services.

Comments

Outpayment figures for Quarter 3 2015/16 have been updated for this report.

Compared to the previous quarter:

- Fixed has declined by 12%
 - Comprised of: Landline down 6%, DQ down 17%, 087 down 15%
- Mobile has increased by 12%
 - Comprised of: PSMS up 14%, Voice Shortcode up 8%, Operator billing up 10%

Compared to the same quarter last year:

- Fixed has declined by 28%
 - Comprised of: Landline down 34%, DQ down 29%, 087 down 16%
- Mobile has increased by 9%
 - Comprised of: PSMS down 4%, Voice Shortcode down 17%, Operator billing up 43%

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6.1 OUTPAYMENTS

Annual view

6.1.1 Outpayments by payment mechanism (Financial year to date) *

	PSMS	Operator billing	DQ	Landline	087	Voice Shortcode	Total
FY 2015-2016	119,255,288	84,081,288	45,379,310	41,941,875	28,783,300	10,568,911	330,009,971
FY 2014-2015	159,208,322	72,407,015	75,311,151	72,807,041	47,773,800	16,082,943	443,590,272
FY 2013-2014	176,905,844	33,274,730	95,617,864	95,689,021	59,218,884		460,706,343
FY 2012-2013	212,884,919	27,704,566	107,022,378	127,863,110	62,439,519		537,914,492
FY 2011-2012	222,371,371	24,455,447	119,325,005	144,378,889	63,843,734		574,374,445
FY 2010-2011	227,115,647	16,864,696	142,379,680	173,877,266	70,262,751		630,500,040
FY 2009-2010	233,242,977	10,154,481	145,256,594	185,860,805	39,335,439		613,850,296

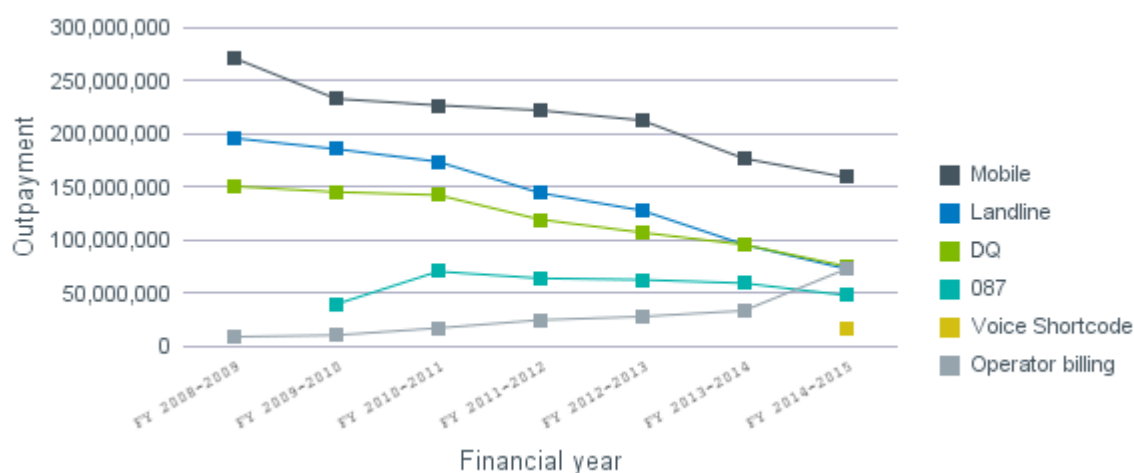
* up on previous financial year

down on previous financial year

6.1.2 Outpayments by payment mechanism (current section of FY only)

	PSMS	Operator billing	DQ	Landline	087	Voice Shortcode	Total
FY 2015-2016	119,255,288	84,081,288	45,379,310	41,941,875	28,783,300	10,568,911	330,009,971
FY 2014-2015	121,930,115	49,825,847	59,191,560	57,252,653	37,314,059	12,385,498	337,899,732
FY 2013-2014	130,013,053	22,827,746	73,598,377	75,733,554	45,359,309		347,532,039
FY 2012-2013	161,743,986	18,248,857	80,599,387	99,220,179	47,231,142		407,043,551
FY 2011-2012	162,248,936	17,028,225	92,096,997	112,293,685	48,717,223		432,385,066
FY 2010-2011	168,600,483	10,884,121	111,855,531	133,411,383	53,646,112		478,397,629
FY 2009-2010	175,890,082	6,708,143	110,612,291	141,990,885	24,836,554		460,037,955

6.1.3 Outpayments by sector (Complete years only)

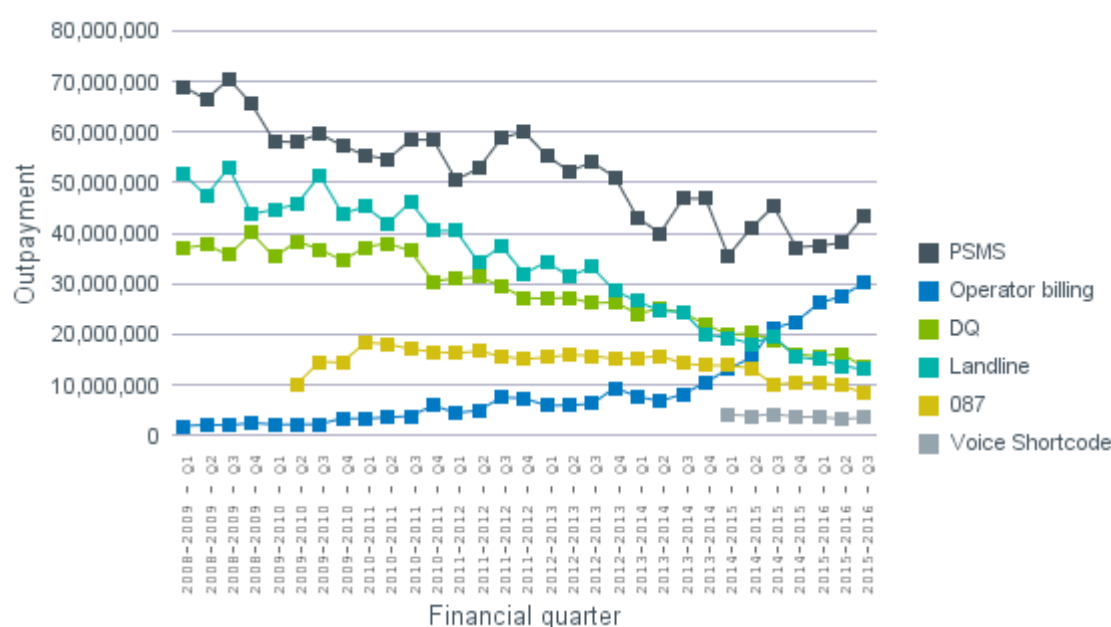


Quarterly view

6.1.4 Outpayments by sector by financial quarter

	PSMS	Operator billing	DQ	Landline	087	Voice Shortcode	Total
2015-2016 - Q3	43,588,432	30,297,876	13,508,381	13,062,923	8,434,215	3,573,445	112,465,273
2015-2016 - Q2	38,129,086	27,573,172	16,203,825	13,835,413	9,866,653	3,297,108	108,905,257
2015-2016 - Q1	37,537,770	26,210,240	15,667,103	15,043,539	10,482,431	3,698,358	108,639,441
2014-2015 - Q4	37,278,207	22,581,168	16,119,591	15,554,388	10,459,741	3,697,445	105,690,540
2014-2015 - Q3	45,333,296	21,222,793	18,984,654	19,669,608	10,073,656	4,286,871	119,570,878

6.1.5 Outpayments by sector by financial quarter



Definitions

PSMS: Premium short message services

Operator billing: A secure mobile payment service, includes payments via "Payforit"

DQ: Directory enquiry services

Landline: A sector of PRS services utilising Non-Geographic number ranges, including 087, 084, 118, 09

087: PRS services utilising the 087 number range. Prices range from approx. 5p per minute to 15p per minute. Typical services include Sales booking lines for Hotels and Cinemas.

Voice shortcode: PRS services utilising the mobile short numbering system which are designated to carrying voice traffic

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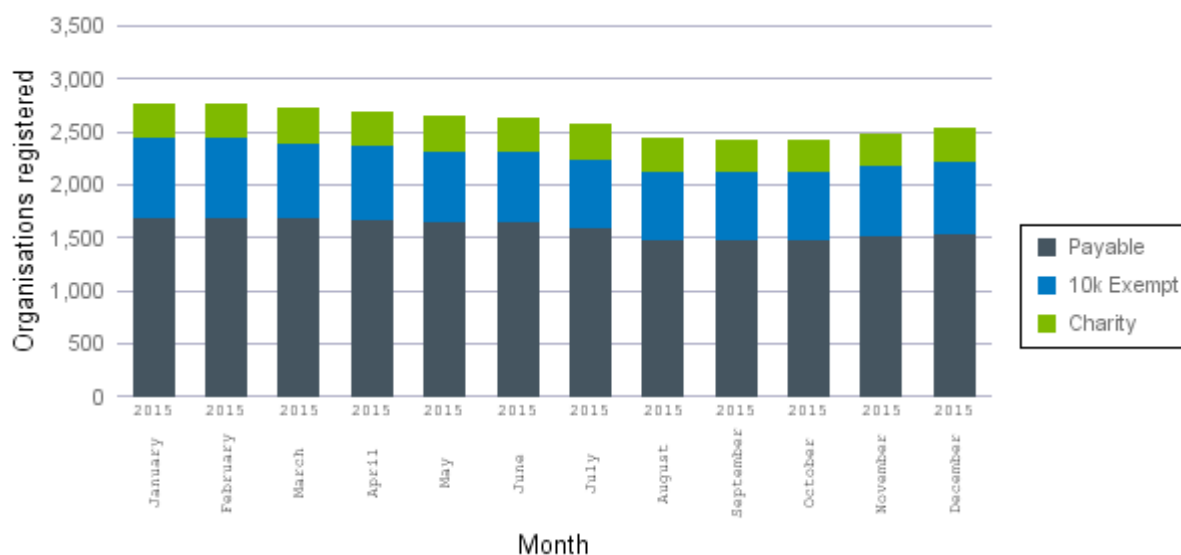
6.2 REGISTRATION BY TYPE

Overview

6.2.1 Total registrations by payment status per month

	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015	2015
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Payable	1,680	1,679	1,676	1,659	1,647	1,634	1,577	1,471	1,464	1,476	1,503	1,518
10K exempt	752	755	707	698	662	664	654	650	648	642	661	700
Charity	322	323	330	336	339	334	334	320	312	303	304	309
Total	2,754	2,757	2,713	2,693	2,648	2,632	2,565	2,441	2,424	2,421	2,468	2,527

6.2.2 Total registrations by payment status per month



Definitions

10k exempt: An organisation whose revenues are less than £10k is not expected to pay a fee in their first year of operation

Charity: An organisation which is a registered charity is not expected to pay a fee

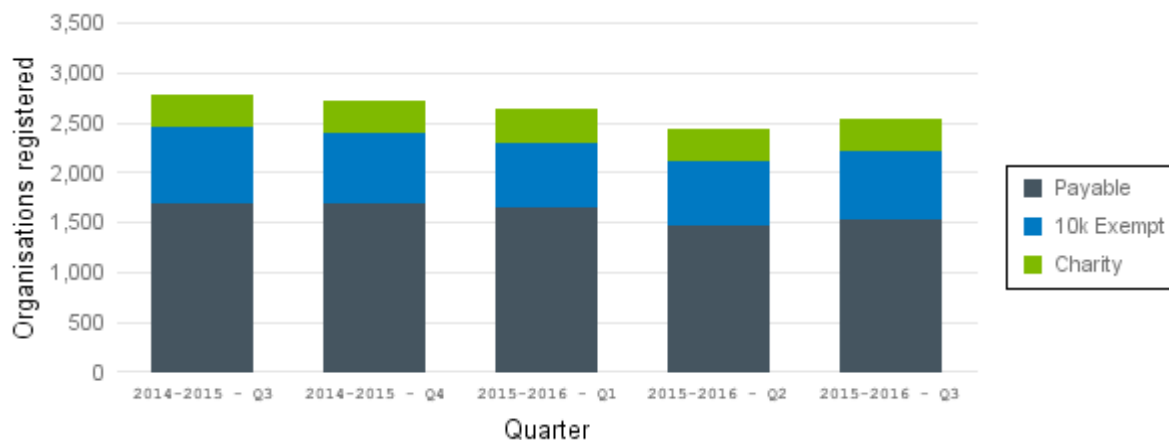
Payable: All other organisations are expected to pay a registration fee

Quarterly view

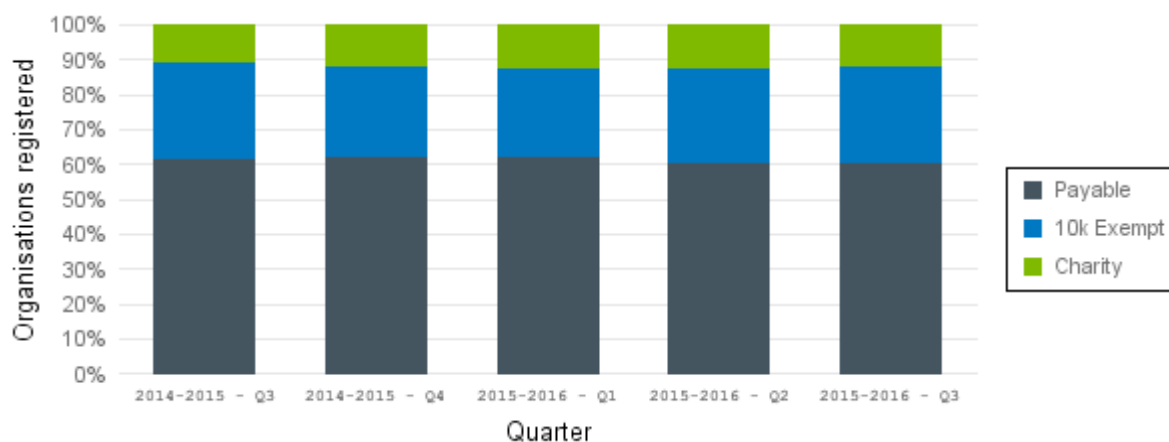
6.2.3 Total registrations by payment status per quarter

	2014-2015 - Q3		2014-2015 - Q4		2015-2016 - Q1		2015-2016 - Q2		2015-2016 - Q3	
Payable	1,689	61.1%	1,676	61.8%	1,634	62.1%	1,464	60.4%	1,518	60.1%
10K Exempt	765	27.7%	707	26.1%	664	25.2%	648	26.7%	700	27.7%
Charity	310	11.2%	330	12.2%	334	12.7%	312	12.9%	309	12.2%
Total	2,764		2,713		2,632		2,424		2,527	

6.2.4 Total registrations by payment status per quarter (volume)



6.2.5 Total registrations by payment status per quarter (proportion)

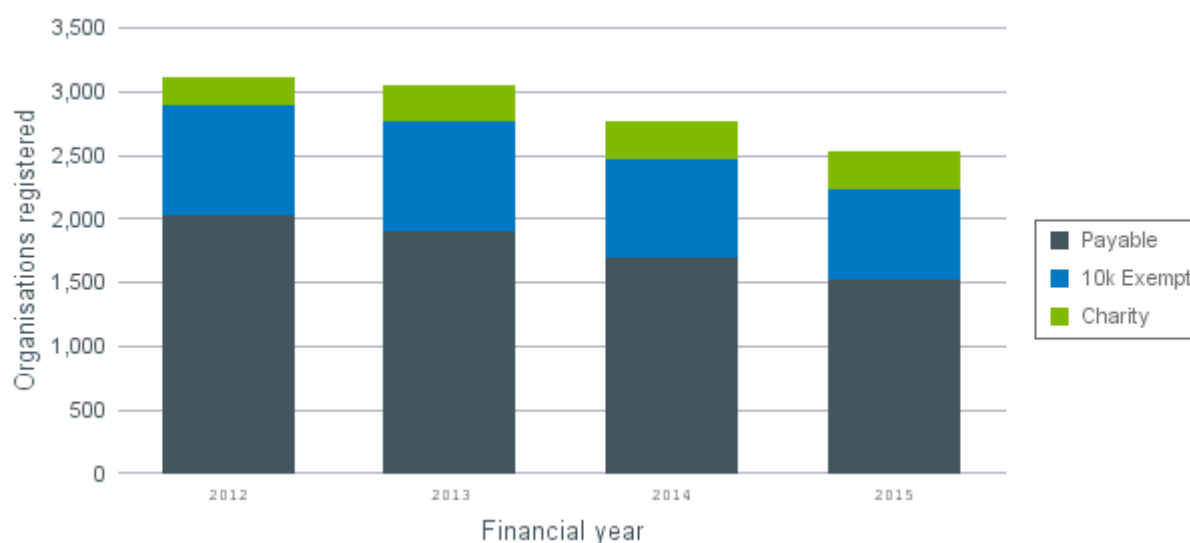


Annual View

6.2.6 Total registrations by payment status per Financial YTD (Q1 - Q3 comparable)

	2012		2013		2014		2015	
Payable	2,017	65.0%	1,890	62.2%	1,689	61.1%	1,518	60.1%
10K Exempt	863	27.8%	872	28.7%	765	27.7%	700	27.7%
Charity	225	7.2%	275	9.1%	310	11.2%	309	12.2%
Total	3,105		3,037		2,764		2,527	

6.2.7 Total registrations by payment status per Financial YTD (volume)



6.2.8 Total registrations by payment status per Financial YTD (proportional)

