



The **fair telecoms campaign** is naturally delighted to provide the most positive response to this consultation.

It is seen to represent total acceptance of a proposal we made in responding to the consultation on approval of the fourteenth edition of the **PPP (PSA)** Code of Practice – [published here](#).

We expanded on the reasons for this proposal in the subsequent published briefing of 1 May 2016 – [The ICSS ‘rip-off’ continues, due to a loophole in regulations](#).

Our proposal for a textual change to the PRS condition is accepted as specified, notwithstanding new sequencing of the items under heading 2(e) – see [page 43 of the Consultation document](#).

As work on preparing this consultation document has been undertaken, we have been delighted to present further evidence to **Ofcom** and to contribute to media coverage of the issue. We feel the nature of this issue was most effectively presented in [this item by BBC Wales ‘X-Ray’](#).

We are grateful to **Ofcom** for its acceptance of our proposal and supportive submissions and its acknowledgement of our contribution – see [item 4.2 of the Consultation document](#).

Responses to Consultation Questions

1. Do you agree with our assessment of harm?

There can be no question about the harm arising from unregulated provision of ICSS services on 084 numbers.

This is caused not only to misled consumers, but also to those to whom calls are forwarded, to telephone service providers seen to levy unduly high charges for calls and to the reputation of whatever genuine industry providing PRS there may be.

2. Do you agree with the proposals for reform?

Ofcom proposes to do what falls within its direct remit to do, i.e. enable the **PSA** to properly regulate provision of ICSS services.

We acknowledge the commitment of the **PSA** to eradicate improper ICSS provision. We fear however that most ICSS services rely on consumers being misled into their use. It is hard to imagine how someone who is offered a link to where a standard number can be found would choose instead to use a premium number.

We therefore see the purpose of the special **PSA** regulations for ICSS as being to largely eliminate it, except in cases where some genuine added value is clearly being delivered to the caller.

We feel that for this measure to be totally effective, it may be necessary for the **PSA** to further strengthen its code, e.g. by mandating a free-to-caller Pre Call Announcement on all ICSS numbers.

3. Do you agree with our proposal of a four week implementation period?

We assume that this proposal is supported by the **PSA**, and that the **PSA** will have made all necessary preparations before the **Ofcom** Final Statement is published. Trusting that **Ofcom** and the **PSA** have agreed a clear plan for what will happen, we cannot disagree.

