

**Daisy Group**

**Your response Question 1: Do you agree with our assessment of harm?**

With regards to poor price transparency and low levels of consumer awareness the evidence submitted by Ofcom provides a clear overview showing consumers do not 'shop around' for the best available deal on the DQ market. While utilising a search engine facility on the internet yields results with the price for specific DQ services, it is reasonable to conclude that callers find themselves in circumstances where they likely do not have access to the internet prior to making the call to look-up the cost.

It may also be reasonable to conclude that following a consumer's first call to a DQ service and their subsequent bill, they would be incentivised to review the market and find a cheaper alternate DQ service if they were unsatisfied with the cost incurred.

Some cases relating to 'bill shock' could be a result of a DQ caller being connected to the number via call connect, therefore increasing the call duration and in-turn the cost of the call.

While higher charges could have potential to offer an increased appeal to fraudsters to utilise higher charging DQ services and have callers mistakenly use the service.

**Question 2: Do you agree with our view that the proposed cap on the service charge for a call to a 118 number of £2.58 (ex VAT) per 90 seconds of the call is an effective and proportionate to remedy the harms identified?**

Regarding poor price transparency Daisy believe the changes would reduce the harm as it would significantly limit the range of service charges being applied. If a customer was aware of the £2.58 limit per 90 seconds then there would be improved transparency across all DQ services as it would not be possible to be charged above this however, as the existing NGCS price points define a 60 second charging mechanism we would appreciate further clarification about how a 90 second control can be implemented.

We believe all DQ providers should make the service charge pricing clear to the caller when connecting calls on their behalf.

The current market has available services that are already charged in line with Ofcom's proposals. If consumers had clearer price information they could already benefit from those lower price. The proposals are suited to consumers who do not have the time or opportunity to shop around for the best available DQ service to suit their financial needs.

**Question 3: Do you agree with our view that an overall implementation period of four months following Statement will be a sufficient time for providers to introduce the proposed cap?**

It is Daisy's view that a period of four months will pose a challenge to DQ providers due to the need for them to carry out any commercial impact analysis and initiate relevant communications. Subsequently price changes need to have sufficient time to flow down from communication

providers and then, in turn, the pricing to end users. Daisy would propose that a six-twelve month period of implementation would be a sufficient timescale.

**Question 4: Do you have any comments on the notifications at Annex 10 and the draft modification set out within them? Where you disagree with the proposed modification, please explain why.**

As the existing service charge charging models define 60 second periods it is our view that this duration model should be retained to maintain simplicity of charge controls. If the 60 second model was maintained the relevant service charge bands available to DQ calls should be defined explicitly and clearly to consumers.