

Introduction

This response addresses both the Ofcom consultation - Directory Enquiries (118) Review, and the PSA consultation - New Special conditions for Directory Enquiry Services. These are run in parallel as they address the same issues, in which both organisations have a role.

The **fair telecoms campaign** is delighted that Ofcom and the PSA have responded so positively to its comments and recommendations, which were re- issued in anticipation of the launch of these consultations -

[Telephone Directory Enquiry Services \(118xxx\) - Comments and Recommendations \[2018\]](#)

We are not dissatisfied that a slightly different approach to that suggested has been taken.

We are however keen that the prospect of a “two-tier” DQ system, with very strict restrictions on high-cost high-value services, be considered in the event that demand for such services and a readiness to supply (albeit heavily restricted) are both found to exist.

Responses to Ofcom Consultation Questions

Your response

Question

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

Essentially

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?

The proper level can only ultimately be determined by a clear view of the market, as it develops, or as indicated by industry.

We are open-minded about the possibility of a high-end market for “advanced” services, subject to much tighter regulatory controls, with the price cap applied only to services that provide only a basic DQ service

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 should be as short as possible. The speed at which price changes have been applied in the past would suggest that implementation within a shorter limit could be achieved.

If providers subsequently find that they have to drop out of the market because they cannot operate within the cap, then so be it.

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.

No