

FCS response to Ofcom consultation: The future regulation of phone-paid services

The Federation of Communication Services (FCS) represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes the opportunity to respond to Ofcom's consultation on the future of phone-paid services. We are broadly in agreement with the approach Ofcom is suggesting and have not responded to individual questions, however, we would like to make a number of over-arching comments.

The FCS welcomes any move to simplify regulation and given the reduction in complaints relating to PRS understands the rationale for transferring day-to-day regulation for PRS from the PSA to Ofcom. It will be important that the PSA's approach of helping PRS providers to be compliant is mirrored by Ofcom. The PSA website contains a lot of help for PRS providers and encourages them to contact the PSA for advice and we expect Ofcom to take a similar approach. It will be important that regulatory focus on this area is not lost and that adequate resourcing continues to be provided. The proposed changes should also not reduce or interfere with the Ofcom work plans or other industry requested work due to staff/resource impacts due to this consolidation.

Ofcom has a well-respected approach to enforcement, and we have no comments on the proposed changes to how potential breaches are investigated. The FCS does however suggest that funding levels are kept under review and action taken if individual charges increase due to Ofcom's inability to use any fines to offset charges. PRS providers should not face increased costs due to changes in regulator.

The FCS welcomes Ofcom's approach to transitional arrangements, and it is important that there is certainty as the new regulations come into force.

Please let me know if you would like to discuss any of our comments.

Many thanks,