

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our assessment of harm? Please give reasons.</b></p>	<p>Yes. This scam is widespread and the vast majority of it seems to be on 084 numbers where it currently escapes the stricter PSA regulation that applies to equivalent services operating on 087 or 09 numbers.</p>
<p><b>Question 2: Do you agree with the proposals for reform? If not, please give reasons.</b></p>	<p>Yes. Extending the PRS Condition to cover all ICSS irrespective of call cost or prefix used seems to be an appropriate remedy.</p>
<p><b>Question 3: Do you agree with our proposal of a four week implementation period? Please give reasons.</b></p>	<p>Yes. If the PSA is ready to accommodate consumer complaints about ICSS operating on 084 numbers in that time frame, there would seem to be no reason for any further delay.</p>

Review of the Premium Rate Services Condition:  
Consultation on extending the definition of Controlled Premium Rate  
Services to include all Information, Connection and Signposting  
Services

This is in response to the consultation published at:

<https://www.ofcom.org.uk/consultations-and-statements/category-2/review-premium-rate-services-condition>

In recent years the number of ICSS telephone numbers has ballooned and it is now almost impossible to avoid seeing these services mentioned in search results when trying to find a contact telephone number for any well-known organisation or business. PSA has identified premium rate numbers purporting to “connect to” around 450 organisations being offered by around 150 providers. This amounts to tens of thousands of such numbers being advertised online. It is readily apparent that the majority of these numbers are in the 084 range where they escape PSA regulation and the rest are mainly in the 087, 090 or 091 ranges. There are also some connection service numbers in the 098 range.

Where people inadvertently call these numbers and experience bill shock, it seems their first line of complaint is to the organisation they called, for having an expensive telephone number, swiftly followed by a complaint to the caller’s telecoms provider to complain about the high call charges incurred. This alone signifies that most callers remain completely unaware they had used a third-party call connection service. The number of complaints made directly to connection services is likely to be vanishingly small.

There are many ways that callers may end up inadvertently using a call connection service:

- searched online and saw a telephone number directly in search results and then called it,
- searched online and saw a paid-for advert with a telephone number and then called it,
- searched online and clicked through to a connection service website but failed to see the pricing information or disclaimers, or such information was hidden or missing,
- called an organisation and asked for the number for a different department and the employee made a search and inadvertently gave out a connection service number rather than their own official number,
- asked an organisation for a number via social media and the employee made a search and inadvertently gave out a connection service number rather than their own official number,
- put a post on social media asking for a number and a friend helpfully searched online and inadvertently gave a connection service number rather than the official number,
- put a post on social media asking for a number and was then given the number by a connection service provider, or by someone promoting such providers, but without declaring this was the case,
- saw the number promoted on social media by a connection service provider, or by someone promoting these numbers, but without any declaration as to the true nature of the number or the cost,
- saw the number promoted by a social media influencer on a lifestyle blog, but with the nature of the number, and/or the cost, not declared,
- seen on websites such as YouTube, Pinterest and many others,
- seen on websites such as Yell.com when searching for a number there.

In most such cases the caller will have been given no clue as to the nature of the number nor been told the call charges. Given this fact, it would seem vital that these services have a mandatory pre-call announcement detailing the fact the number is a third-party service and announcing the premium rate call charges. A free-to-caller announcement would give those callers who did not want to use the service time to hang up without being charged.

ASA details many complaints made over the years, but ASA has limited powers. Bringing all ICSS under PSA control will allow this sector to be more closely regulated.

Over the last few years, several organisations have issued warnings to their customers urging them to avoid calling ICSS numbers. ActionFraud has also issued a number of such bulletins.

It may be useful to co-ordinate with PSA and ActionFraud to encourage a large number of the 450 organisations identified by PSA as having been targeted by connection services to also issue such a warning and to add a prominent notice on their respective websites mentioning they only offer contact numbers starting 01, 02, 03 or 080 and do not offer any premium rate numbers starting 084, 087 or 09.

When calling DWP, an announcement is heard saying that “calls are free”. A small modification to the announcement to say that “calls to the 0800 numbers listed on GOV.UK are free” would likely help many callers who have inadvertently connected via a third-party service.

ICSS on 084 and 087 numbers is noted as mostly operating on the following number ranges:

**0843** followed by 118, 168, 222, 308, 320, 455, 459, 504, 506, 507, 509, 515, 538, 557, 596, 658, 713, 770, 826, 850, 902, 903 or 922

**0844** followed by 043, 248, 306, 324, 335, 372, 375, 381, 385, 448, 453, 477, 496, 545, 561, 576, 696, 764, 770, 800, 826, 835, 844, 846, 850, 887 or 995

**0870** followed by 174 or 280

**0871** followed by 050, 246, 508, 574, 683, 871, 943, 953 or 989

**0872** followed by 110, 437 or 494.

It is to be noted that PSA consistently refers to these services as “Information, Connection and/or Signposting Services”, a description which is very slightly different to the proposed Ofcom wording.