

Consultation response form

Please complete this form in full and return via email to ICSS.consultation@ofcom.org.uk or by post to:

Kathryn Searle Ofcom Riverside House 2A Southwark Bridge Road London SE1 9HA

Consultation title	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
Full name	[✂]
Contact phone number	[✂]
Representing (delete as appropriate)	[✂]
Organisation name	[✂]
Email address	[✂]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question	Your response
Question 1: Do you agree with our assessment of harm? Please give reasons.	<p>Confidential? – N</p> <p>It is our opinion that the concerns regarding ICSS (or directory website services) that offer call forwarding through an 084 number range, are not rooted in the nature of the service, but rather from the charging mechanism currently in place. We believe that any harm arising from calling an 084 service is not from the service charge, which is minimal (1-7p per minute), but from the high Access Charges that are levied by call providers of up to 55p per minute. The Access Charge is, for the most part, ludicrously out of proportion with the service charge and makes a mockery of having a 1p to 7p service charge band which, in reality, becomes a 56p to 62p charge when dialled from a mobile. We believe that it is the high Access Charges that should be addressed so that using a low cost service number becomes a viable option and one that has a sensible place within the variety of telecom tariffs available. This range exists to service businesses who would like a national number that can cover the cost of routing and still be low cost to the caller.</p>
Question 2: Do you agree with the proposals for reform? If not, please give reasons.	<p>Confidential? – N</p> <p>We believe that a reform is required but it should be directed towards controlling and capping Access Charges rather than seeking to support high Access Charges and regulate 084 services which in themselves are low cost and not harmful to consumers.</p>
Question 3: Do you agree with our proposal of a four week implementation period? Please give reasons.	<p>Confidential? – N</p> <p>No. We do not believe that any 084 services should be regulated by the PSA. When the current price bands were introduced the reasoning was to make the costs clear to the consumer however the opposite is true. Call Providers were instructed to clearly show the separation of the Service Charge and their Access Charge, and this is rarely the case. Most</p>



invoices show a total charge which leads consumers to believe that 084 numbers have a high cost of calling when this is not the case.

Any confusion over costs is the result of Call Providers not making their costs clear and taking advantage of their oligopoly by agreeing high Access Charges between them rather than competing to have the lowest Access Charges.

It has made the 084 range redundant and no longer trusted as a result. The low tariff number ranges no longer serve any purpose as they are not low tariff on any network, not even BT landlines. It is obvious to most that a 5p per minute number should not have a 60p charge to the caller, it is an unthinkable overcharge of 1200%. The same access charge applied to a £2.50 number is a more acceptable proportion but still equates to 20% increase in call cost

Capped rate calls are also affected when the price is advertised as “per call” but a per minute Access Charge is applied.

We believe that a review of the Access Charge would be a more in line with consumer protection and that low cost 084 service numbers should be just that... Low cost.

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