

## Consultation response form

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

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

<b>Consultation title</b>	<b>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</b>
<b>Full name</b>	[X]
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	[X]
<b>Organisation name</b>	[X]
<b>Email address</b>	[X]

## 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](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	[X]
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## Your response

Question	Your response
<p>Question 1: Do you agree with our assessment of harm? Please give reasons.</p>	<p><b><u>Sky agrees with Ofcom’s assessment of harm and, in particular, the four key risks associated with Information Connection and Signposting Services (“ICSS”) identified in the consultation:</u></b></p> <p>(1) the potential for serious consumer harm as consumers are being misled into using ICSS services leading to financial harm and bill shock as well as emotional distress; (2) specific risks to vulnerable consumers as some ICSS providers target public service helplines; (3) risks to the reputation and operation of both public and commercial organisations as consumers may blame the organisation to whom the calls are being put through to for any financial and emotional harm suffered. This also causes damage to the operation of these organisations as they spend time, money and resource attempting to combat this reputational harm; and (4) the way in which ICSS is being used leads to consumer trust and confidence in PRS being undermined.</p> <p>Sky agrees that <u>these harms are likely to be the same, or similar, for number ranges that do not fall within the PRS Condition</u> as those that currently do and agrees that extending the definition of Controlled PRS to include all ICSS would help.</p> <p>In particular, Sky agrees with Ofcom’s comments at paragraph 4.7 of the Consultation and Ofcom’s application of the PRS Analytical Framework to ‘084’ ICSS.</p> <p>Sky notes that, based on its own internal analysis, the significant majority of numbers being used for ICSS routing to Sky service numbers are in the 084 range, and therefore, Ofcom’s focus on this number range is appropriate. Nevertheless, <u>Sky agrees with Ofcom that the risks of harm arising from 084 ICSS are largely the same as those arising from ICSS operating on any number range (para. 5.10).</u></p>

**Question 2: Do you agree with the proposals for reform? If not, please give reasons.**

Sky agrees with Ofcom's proposal to modify the PRS Condition to extend the definition of Controlled PRS to include all ICSS, irrespective of the number through which they are obtained or the level of the Service Charge which applies.

Ofcom's proposal, since it is not limited to 084 numbers, would help ensure that ICSS providers do not evade PSA regulation by simply migrating to other numbers which would not be captured by the PRS Condition.

Sky agrees with Ofcom's assessment that it is particularly important to ensure that no regulatory loopholes exist. As Sky has seen, in particular with reference to services that result in the artificial inflation of traffic, some third party "service providers" will abuse regulatory loopholes and rapidly migrate number ranges when identified, making it difficult to limit and address consumer harm.

**Question 3: Do you agree with our proposal of a four week implementation period? Please give reasons.**

**Sky agrees with the proposal of a four week implementation period.**

However, Sky would further encourage Ofcom to ensure that the PSA has sufficient resources to support implementation in this timescale and continue effectively regulating the ICSS that fall within its widened remit from that date.