

## 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>	Steve McGeary
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Via-vox Ltd t/a PowWowNow

## 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>	Nothing
<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>	Yes

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our assessment of harm? Please give reasons.</b></p>	<p>Confidential? –N</p> <p>While I agree that the numbers are used in the ways you describe, the real consumer harm is from the disproportionately high access charges, particularly from mobile providers.</p> <p>Even if the numbers are PRS and published in an appropriate way, there is still a significant risk of financial harm/bill shock, when the access charge is ten times the published service charge.</p>
<p><b>Question 2: Do you agree with the proposals for reform? If not, please give reasons.</b></p>	<p>Confidential? –N</p> <p>The real financial harm &amp; bill shock is not from service charges but access charges. Access charges need to be controlled to enable consumers to make an informed decision at the time of purchase. Displaying 'the call will cost you 7ppm, plus your phone company's access charge', when the access charge is 55ppm, is not providing clear information to the consumer.</p> <p>A new model for access charges has to be implemented. Either a fixed price depending on origination or, like some European models, the access charge is equivalent to the cost of the consumer calling a geographic number. In either case, when the service is promoted the consumer can see the true cost of the call at the point of purchase.</p> <p>We provide conference services using 084 numbers and without exception, the bill shock complaints we receive are due to the customer not knowing the cost of their mobile access charges.</p>

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

Confidential? –N

Yes, four weeks will be sufficient.

**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