

Your response

Question	Your response
<p>Question 1: Do you consider Ofcom should approve the PSA's 15th Code of Practice in its current form? Please provide an explanation to support your response.</p>	<p>No, Ofcom should not approve the PSA's 15th Code of Practice in its current form.</p> <p>I would like to endorse the response from aimm, the industry trade body, which includes a number of concerns raised by a range of stakeholders.</p> <p>Other than needing more detail in some key areas (as outlined in the aimm response), a primary concern about the proposed 15th Code relates to an aspect of the proposed Fairness Standard contained in 3.3.11 that requires the reauthentication of subscription users every 12 months.</p> <p>At both PSA and aimm workshops, there has been unanimous disagreement to this proposal from across the value chain including MNOs, charities, Level 1 and Level 2 providers. The robust consent to charge requirements in place for subscription sign ups, along with the receipting and billing reminder rules, and the ability to easily cancel a subscription at any time without notice, all mean that the consumer is always in control and far more so than when compared to other payment mechanics.</p> <p>The general concern is that the imposition of a 12-month re-authentication requirement would put mobile billing at a disadvantage when compared to other payment mechanics that do not carry the same rule. When this concern is shared across the whole value chain, it would indicate that the rule needs further consideration with a closer look at the likely impact.</p> <p>Indeed, there is also a feeling in the industry that more could be done to promote the unique benefits that mobile billing enjoys over other payment mechanics, including ease of use,</p>

	spend control and a tightly regulated environment.
Question 2: Do you have any views on the appropriate implementation period?	Yes, six months would be the minimum required for an effective implementation period.