

Your response

TELECOM2 LTD RESPONSE



About Telecom2

Telecom2 are a voice network carrier with offices in London and Spain. Through the group of companies our focus is to be at the forefront of technology, specialising in VoIP B2B and call centre solutions. T2 also specialise in micro payments across mobile, card services and age verification.

Telecom2 has a broad spectrum of clients including a number of Contact Centres, Print media companies, Charities, TV companies and a Premiership Football club.

We also still have some of the traditional clients on 09 PRS running Adult, Psychic and Competition services.

We have achieved PCIDSS, Cyber Security and ISO27001 certification and are working towards ISO9001 certification with the expectation this will be achieved this year.

We welcome this opportunity to contribute to the formal consultation exercise. Our comments are based on internal knowledge and experience.

Question	Your response
Question 1: Do you have any comments on the suggested measures set out in Section 3?	<p><i>Is this response confidential? – No</i></p> <p>All the suggested measures are appropriate and not overbearing or resource hungry, we're very happy with them.</p> <p>Section 2, Para 2.8 does give us some concerns. It says "We will collaborate and share information more widely, including with Government, regulators, law enforcement and consumer groups. "</p> <p>This sharing should be extended to range holders as they are the front line organisations, that are best placed to block or disrupt scams.</p>

Question 2: Have you used any other due diligence checks that you think would be beneficial if adopted across the industry?

Is this response confidential? – No

We tend to apply the PSA DDRAC standard measures as appropriate to the customer and use of the numbers. We find this tends to work well. These measures go far beyond those set out in section three of the consultation.

We also have clauses in our agreements that require our clients to be aware of and comply with legislation and regulation in the use of the numbers and have taken the power to suspend service or terminate agreements where these clauses have been breached.

We offer first line support to clients who are having difficulty interpreting regulation and if necessary signpost them to regulators compliance teams.

Question 3: Do you have any comments on the suggested measures set out in Section 4?

Is this response confidential? – No

We're happy with the measures in Section 4. We would emphasise that the point in 4.8 about engaging is very true, we have good engagement with our clients, the amount depends on what they are doing with the numbers sub allocated to them, this does help with identifying and addressing non compliance that is typically due to a mistake rather than wilful breaches committed for benefit.

Question 4: Have you used any other ongoing checks to ensure compliance that you think would be beneficial if adopted across the industry?

Is this response confidential? – No

The PSA DDRAC standard gives a good range of measures but the comments below on section 5 are also relevant to section 4

Question 5: Do you have any comments on the suggested measures set out in Section 5?

Is this response confidential? – No

The measures in section 5 are really only good business practice, to prevent reputational and actual harm to the provider and the industry and service.

We would add however that as range holders we need better cooperation from phone service providers and regulators.

	<p>Some methods of misleading consumers are invisible to the Range Holder. In these cases, issues are more likely to be seen by Consumer's Phone Service Providers but they are usually slow to notify range owners and even slower to provide evidence of poor behaviour. This allows the scams to continue beyond when they could have been stopped, to the detriment of consumers and end users but the phone service providers, particularly in the case of calls to PRS, profit from access charges, and service charges where an AIT case is raised. Consumers rarely receive a refund of the service charges from their providers and never the access charges. Another timing issue is the delay between complaints being received by a regulator and the complaints being notified to range owners. This delay is usually significant. Often these complaints are spurious, caused by a lack of attention on the part of consumers, but where a genuine issue is detected from the complaints then prompt action by the regulator can enable range holders to significantly reduce consumer harm.</p>
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