

Communications Consumer Panel response to PhonepayPlus' Business Plan and Budget 2012/13

The Communications Consumer Panel welcomes the opportunity to contribute to PhonepayPlus' consultation on its business plan & budget 2012/13.

Comments on priorities

The Panel agrees with the identified priorities but would make the following observations:

- Whilst it may be implicit within the outlined plan, a priority should also be continual promotion of the new Code so that its longevity can be established and its success proven via demonstrable positive outcomes for industry and consumers.
- Similarly, an explicit priority should be operational efficiency and a continually improving consumer awareness and experience. For example, a priority to ensure that consumers are fully informed/aware of what to expect at all stages of the PRS experience which should aid satisfaction with the end to end service.
- To support consumer empowerment, the Panel would encourage extending the use of the 'Number Checker' and 'PhoneBrain'.
- The Panel feels strongly that consumers need to be able to have trust and confidence in micropayments - it therefore encourages PhonepayPlus to continue research into this area.
- The Panel welcomes PhonepayPlus' intention to research the consumer behaviour of vulnerable consumers and children.
- The Panel would encourage monitoring around provider action to mitigate bill shock and PhonepayPlus working closely with providers to ensure that there is transparency around issues of in-app payment via PRS.

- Finally, under point 4.3 - in relation to consulting and collaborating with industry about new guidance - it would be helpful for this section to also make mention of engagement with consumer bodies.

Budget

- The Panel recognises the budgetary pressures facing PhonepayPlus but notes that the budget for industry support has risen - and is significantly higher than that for consumer support, which has fallen in both real and percentage terms. While this may at first sight appear to be counter-intuitive, the Panel hopes that the intention is for support for industry to translate into better outcomes for consumers.
- The Panel would be interested to know if there is any evidence to suggest that spending more on Code compliance and development might result in less being spent on investigations and complaints?