

## Communications Consumer Panel response to PhonepayPlus' consultation on the extension of PhonepayPlus regulation to remaining revenue sharing ranges

The Communications Consumer Panel welcomes the opportunity to contribute to the consultation the extension of PhonepayPlus regulation to remaining revenue sharing ranges.

### Q1 - consumer protection rules appropriate for lower cost revenue-sharing ranges

- The Panel considers that PhonepayPlus' consumer protection rules are appropriate for the lower cost revenue-sharing ranges.
- However it should be noted that there may be an issue in relation to, for example 0845 numbers - where the purpose of the revenue raised is not profit generation but a contribution to cost - but where nonetheless consumers experience detriment due to undue delays in getting the service. There is therefore a potential issue around a workable definition of an undue delay. Can consumers not just start to pay when the service element of the call is reached?
- In relation to the point above, to what extent will any rules equip/enable PhonepayPlus to hold relevant organisations to account?

### Q2 - if lower cost 08xx ranges are subject to PhonepayPlus regulation is it necessary to modify branding or presentation?

- A modification in branding would be helpful - to provide greater clarity for consumers, which in turn may also help industry.
- In relation to the above point, to support consumer understanding and empowerment, it may be worth exploring having two classes of PRS calls - high premium profit generation services, and low premium cost recovery services.
- There should be immediate clarity about what type of call is being made - and at what cost to the consumer.
- Calls to complain about the quality of service delivered by an organisation should not be at the cost of the consumer.