

Question 1: Do you have any comments about the proposed extension of PRS regulation to 0871, 0872 and 0873 numbers?:

Long overdue.

Question 2: Do you have any comments about the PhonepayPlus Statement of Application and Ofcom's comments about the concerns that have been raised by stakeholders?:

I have no sympathy with the concerns of the dishonest "stakeholders" (of whom there are all too many). The concerns of honest "stakeholders" (say about the burden of due diligence) could easily be addressed if PhonePayPlus took some basic measures to "clean up" the "industry". Since there appears to be very little prospect of this happening, I should simply suggest to honest stakeholders that they do a great deal more themselves to protect their businesses and their customers from PRS crime and drive the crooks out of the industry.

Question 3: The proposed extension of PRS regulation would mean that service providers offering services on 09 numbers would not be permitted to use 0871, 0872 or 0873 numbers for complaints unless call charges are refunded. Ofcom would also welcome stakeholder comments about this secondary impact of the proposals:

Another essential and long overdue change. Not sure about the "unless call charges are refunded" clause however. This sounds as though it could be a loophole that will be misused. It should never be forgotten that PRS is the home of widespread dishonesty and fraud. Any regulation that are to apply to this "industry" have to be defined extremely tightly if they are to have any effect.

Question 4: Do you have any comments on the proposed modifications to the PRS Condition?:

Question 5: Do you have any comments about the Impact Assessment for these proposals?:

Question 6: Do you have any other comments?:

All companies using 087 numbers should also be compelled to publish an alternative geographical number - unless (perhaps) some kind of genuine "service" is offered on the number (cf normal customer enquiries).

Not allowing diallers on 087 numbers (or any others) is clearly essential, as is a ban on the use of 087 numbers by the "customer service " lines used by PRS criminals. In general, however, 087 numbers are a bit of a side show.

What is really required in PRS is what has always been required:

The option for phone users to ban PRS calls/texts from and TO their phones.

A robust and verifiable opt in system for "subscription services".

PhonePayPlus and Ofcom to report fraud and theft (cf misselling) to the police.