

1. BT welcomes the opportunity to comment on the proposed amendments to the PhonepayPlus 11th Code of Practice. In summary, BT supports the changes as it will mean a dedicated Code Compliance Panel (CCP) is formed which should continue to ensure consumers are protected and at the same time will professionalise the associated processes via the Tribunals.

2. BT believes it is essential that there is a degree of separation between the Board and the CCP to ensure the decision making is made in a professional, independent and rapid manner. Clear roles and responsibilities will need to be established to ensure the CCP is genuinely independent. BT suggests that PhonepayPlus should make these processes as transparent as possible.

3. BT suggests that the CCP will need to be audited at regular intervals so that any learning can be reviewed and actioned appropriately. In addition Ofcom should establish with PhonepayPlus some key performance indicators so that progress can be measured and corrective action put in place. It would also be useful for any associated learning or results to be shared with industry where appropriate.

4. BT suggests that further work is needed concerning the changes to the 11th Code of Practice. BT believes that the use of language is not very helpful or clear and seems to be legally based. For example, the definition of words such as 'constitution' is not immediately obvious. PhonepayPlus may like to consider working with the Plain English Campaign.

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