

Comments:

My interest arose when my mother-in-law, who was registered partially-sighted, started to run up excessive telephone bills on premium rate calls, because she had been unaware of the high charges these incurred. In the advertisements, price details were always in smaller print, which she could not read, than the rest of the text.

Consequently I only wish to answer questions regarding the unsatisfactory issue of prices.

Question 4.1: Do you agree with our analysis of the characteristics of the PRS supply side and the possible concerns related to these characteristics?:

Question 4.2: Do you agree with our analysis of the demand characteristics of PRS? Do you think there are additional characteristics which are not included in our analysis?:

Question 4.3: Do you agree with our assessment of the potential consumer harm in a situation where PRS regulation is ineffective?:

Question 4.4: Do you agree with our assessment of the potential and actual consumer harm in respect of PRS?:

Question 5.1: Do you agree with the application of the characteristics to the services?:

Question 5.2: Do you agree with our assessment of potential harm for each of the services?:

Question 5.3: Do you agree with our assessment of alternative means of protection for the new services in our analysis?:

Question 5.4: Do you agree with our analysis of the appropriateness of self-regulatory initiatives in the context of PRS?:

Question 5.5: Do you consider self-regulatory initiatives could be implemented for (certain) PRS? If so, please set out for which services, and what such an initiative would look like.:

Question 6.1: Do you consider there is a consumer benefit requiring all OCPs to offer the same retail price to a PRS number?:

Question 6.2: If you do believe there is a consumer benefit, do you have suggestions as to how this option could be implemented?:

Question 6.3: Do you consider this option could have any negative side-effects? If so, which ones?:

Question 6.4: Do you consider PCAs would improve price transparency in the PRS market?:

This is the nub of the issue. PhonepayPlus's commendable rule 5.7.1, as quoted in para 6.20, is clearly not being achieved at present. PCAs, which should not be themselves charged, seem to be the simplest way of ensuring that callers, even if partially sighted, do actually know what they would paying, .

Question 6.5: Do you consider Ofcom should carry out such a study? If so, which aspects should such a study cover?:

The issue seems clear-cut. Besides the non-observance of rule 5.7.1, the study found that 76% of consumers want better price transparency, and 73% prefer PCAs. The consumer is entitled to know how much is being charged for the PRS. The various players in the supply chain can sort out how this is done. What is there for Ofcom to study?

Question 6.6: Do you consider including BT's tariff and a maximum tariff for the PRS in PRS advertisements would improve price transparency in the PRS market?:

No.

Question 6.7: Do you consider the name of the OCP with the highest tariff should be included? :

No.

Question 6.8: Do you consider there are any additional implications linked to this option, apart from the ones we have set out above?:

Question 6.9: Could you provide us with an estimate of cost information regarding the collection and updating of tariff information (for SPs and OCPs)? Do you believe there are there any other costs involved under this option?:

Question 6.10: Do you agree with our proposal to expand the PhonepayPlus number checker? :

Question 6.11: Which criteria should be used regarding numbers to be included in the number checker (e.g. revenues, complaints over the last X weeks etc)? :

Question 6.12: What information should be included per number in the number checker?:

Question 6.13: Do you agree PhonipayPlus should carry out an analysis into the benefits of requiring SP/IPs to adopt a formal complaints procedure?:

Question 6.14: Do you consider that in light of developments in the PRS market, IPs should be targeted as a point of regulation, in addition to SPs or on their own? If so, what kind of rules should be applied to IPs and/or SPs?:

Question 6.15: Do you consider there are other options for a registration scheme / reputational database which have not been included in these studies?:

Question 6.16: Which is your preferred option, and what are the reasons for this?:

Question 6.17: Do you agree with our analysis that PhonipayPlus should run a registration scheme / reputational database?:

Question 6.18: Do you agree with the options identified regarding call barring facilities? :