

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional conclusion regarding market definition? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 2: Do you agree with our provisional conclusion regarding SMP? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 3: Do you agree with our provisional conclusion regarding the three-criteria test set out in section 79(2B) of the Act? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 4: Do you agree with our provisional view that setting a price cap on A2P SMS termination rates (based on historical pricing with indexation) would be the most appropriate and proportionate response for addressing our competition concerns arising from SMP (identified in section 5)? If not, please explain why.</p>	<p>Confidential? – Y / N</p>
<p>Question 5: Do you agree with our provisional view that Option 2 would be effective in addressing the risk (identified in Section 5) that terminating MCPs have the ability and incentive to set and maintain prices for the termination of A2P SMS at an excessively high level, while Options 1 and 3 would not fully address that risk? If not, please explain why.</p>	<p>Confidential? – Y / N</p>

Question 6: Do you agree with our proposal to set the price cap at a level based on an average of the four large MNOs' December 2020 prices, adjusted using CPI? If not, please explain why.

Confidential? –Y / N

The Association for Interactive Media and Micropayments (aimm) is the specialist UK-based trade organisation representing the commercial and regulatory interests of member companies involved in the interactive media and micropayment industries - where consumers interact or engage with services across converged media platforms and may pay for those services or content using a variety of micropayment technologies including premium rate. We are a not-for-profit organisation, funded by our members, run for our members. We create conditions for growth and protect the regulatory environment in which our members operate.

aimm has a membership that represents the entire value chain – from the providers and promoters of information to the network operators and technical service providers that deliver and bill them to customers. No other organisation has such reach or representation. Members of aimm work collaboratively to address key industry issues and to build a trusted business environment, encouraging investment, creating new opportunities and developing business partnerships.

On occasion, this representation means that areas of the membership may have opposing views in a particular area. This consultation falls into this category. Members from the Mobile Network Operators and Merchants (such as Broadcasters) may respond with contrasting submissions. aimm seeks to input into consultations such as these with a collective voice, but there are instances when this is not possible - and this is one such instance.

As such, at this time we would like to draw Ofcom's attention to the views of both areas of the value chain, which will be submitted via individual responses, business depending.

Question 7: Do you agree with our impact assessment? If not, please explain why.

Confidential? – Y / N

Question 8: Do you agree with our assessment of the potential impacts on specific groups of persons, as set out in paragraphs 2.36-2.37? If not, please explain why.	Confidential? – Y / N
Question 9: Do you agree with our proposal for a three-month implementation period following the publication of our final Statement? If not, please explain why.	Confidential? – Y / N

Please complete this form in full and return to a2psmsTerminationReview@ofcom.org.uk.