

Your response

About Telecom2

Telecom2 are a voice network carrier with offices in London and Spain. Through the group of companies our focus is to at the forefront of technology, specialising in VoIP B2B and call centre solutions. T2 also specialise in micro payments across mobile, card services and age verification.

Telecom2 has a broad spectrum of clients including a number of Contact Centres, Print media companies, Charities, TV companies and a Premiership Football club.

We also still have some of the traditional clients on 09 PRS running Adult, Psychic and Competition services.

We have achieved PCIDSS and ISO27001 certification

We welcome this opportunity to contribute prior to the formal consultation exercise. Our comments are based on internal knowledge and discussions with clients

Question	Your response
<p>Question 1: Do you consider Ofcom should approve the PSA's 15th Code of Practice in its current form? Please provide an explanation to support your response.</p>	<p>The move to Standards from Outcomes is a welcome and much needed change. It should provide greater clarity and certainty of what is acceptable.</p> <p>That said however, we do not believe that the code in its present form should be approved.</p> <p>There are several reasons for this.</p> <p>The first is that the draft is incomplete, with detail in some crucial areas still to be published and consulted on.</p> <p>The proposed requirements for DDRAC and Security and Systems are onerous, not proportionate to the realistic potential for harm and not appropriate to all service providers, particularly the smaller new entrants. They will act as a barrier to entry. The PSA are suggesting that they have similar powers to other regulators, including the FCA, PSR and ICO but the harm that can be caused by the sectors covered by these regulators could, and often does, affect many thousands of people and involve millions of pounds. This is not the case with Phone Paid Services.</p> <p>The responsibility of Consumer's Phone Service Providers to protect consumers and the sums of money they make from poor practices by Service Providers are not addressed.</p>

	<p>The requirement to reauthenticate subscription users after 12 months is not necessary, other methods of ensuring that consumers can withdraw from services are already in place and proven to be effective. This requirement could seriously impact on Charities' revenues.</p>
<p>Question 2: Do you have any views on the appropriate implementation period?</p>	<p>We would like a nine month implementation period. This is because Network Operators are going to have to review all existing services provided on their numbers and platforms to ensure compliance with the new standards and Network Operators and Service Providers will in many cases have to formalise existing procedures where the code requires formal processes to be in place for such things as Vulnerable Consumers and Customer care</p>