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21 June 2011

Ofcom Consultation

Modifying who is subject to the Premium Rate Services Condition

Submission by

Association for Interactive Media and Entertainment

(AIME)

AIME (www.aimelink.org)

AIME is a UK based not for profit trade association that promotes excellence in the Interactive Media and Entertainment industry.

We uphold our Code of Ethics and Core Values to create an environment of consumer trust and industry confidence within which our members' commerce can grow. We are committed to furthering the interests of the Interactive Media and Entertainment Micro Payments industry through the regular exchange of information and communication throughout the value chain, effective engagement with regulators and legislators and the presentation of a successful industry image to media.

We are the only UK trade association with membership across all elements of the interactive media and entertainment value chain, which includes Premium Rate Service (PRS) billing facilities, and our membership represents in excess of 90% of annual industry revenues which stood at £0.8bn in 2010 within the UK. We believe this industry has the potential to significantly increase future revenues assuming we have a healthy balance of self and formal regulation and that industry is successful in continuing to build consumer trust.

AIME promotes and abides by the philosophy that consumers who are accurately and openly informed of the nature, content and cost of participation in an interactive service experience are perfectly placed to exercise their freedom of choice and thereby enjoy the most effective form of consumer protection.

General

AIME welcomes the opportunity to respond to this consultation on amending the Ofcom PRS Condition to mirror the remit of PhonepayPlus and support the introduction of the Ofcom approved 12th Edition of the PhonepayPlus Code of Practice.

Consultation Questions

Question 1:

Do you agree the PRS Condition should be amended to require all Controlled PRS Providers to comply with directions made by PhonepayPlus for the purpose of enforcing its Code of Practice?

Answer 1:

Yes, AIME agrees.

Question 2:

Do you agree that the proposed amendment to the PRS Condition (see Annex 4) gives effect to this intention?

Answer 2:

AIME agrees that such an amendment to the PRS Condition will help to ensure the successful implementation of the 12th Edition of the PhonepayPlus Code of Practice and that widening the scope of the PRS Condition will strengthen the ability of PhonepayPlus to take enforcement action against those providers that fail to comply with sanctions imposed under the new Code.

The Schedule attached to Annex 4, which is extracted from the Communications Act 2003, would clearly benefit from a review of its, now outdated, terminology.

Statement of Representation

AIME confirms that this response has been compiled following a process of internal discussion and distribution of the relevant Consultation documentation to all AIME members. A list of members can be found at <http://www.aimelink.com/home/members.aspx>

The views expressed in this response are a fair representation of the majority views held by the responding AIME membership. Individual members are actively encouraged to submit their own independent views as they deem fit and at their sole discretion.

Close

We assure you that, as ever, our comments are made constructively and with the intent of achieving an effective, fair and proportional regulatory regime for Premium Interactive Media and Entertainment services in the UK.

If any clarification to our response is required or if we can be of any further assistance please contact Zoe Patterson at +44 (0)1273 685328 or zoe@aimelink.org

Toby Padgham
AIME General Secretary