

Dear Richard

Some informal input to your consultation exercise.

The principles look OK, though there is potentially a gap between the circumstances in which stakeholder-provided information is adequate and those in which ICSTIS feels justified in taking action itself. It would be helpful to consumers if ICSTIS could provide links or pointers towards the stakeholder-provided information (going further than simply "contact your telephone company" - that's all very well for people with a lot of spare time and energy!).

The actions are also fine, so long as they are backed by the resources actually to realise good intentions (eg achieving stated answering standards on the helpline).

A suggestion for improving the website. The consumer entrance could rapidly lead to descriptions (preferably illustrated) of the current most common types of problem, with company details removed. This would be the natural place for people clicking through from the OFT scams webpage to arrive:

<http://www.of.gov.uk/Consumer/Scams/Premium+rate+phone+numbers.htm>

I seem to remember seeing some overseas consumer information material at the OFT Mass Marketing Scams event a year ago (was it Canadian?) which was much more colourful and effective than anything available here. See also, for example,

http://www.phonebusters.com/english/recognizeit_900.html

<http://www.cbs.gov.on.ca/mcbs/english/56VLDB.htm>

and <http://www.ftc.gov/bcp/menu-call.htm>

It would also be easy, and sensible, to link the consumer entrance directly to the existing consumer information leaflets, which currently are buried in "publications".

best wishes

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