

Introduction

BT welcomes the chance to respond to this ICSTIS consultation. The provision of information to consumers is very important in such a dynamic and potentially complex environment. Whilst the potential for consumer harm in such a context is very much acknowledged, ICSTIS must strike a balance between information designed to help customers to make informed choices about their telephone use and, where there is a problem, ensuring they can get sufficient help and advice to resolve it. Information should be simple, accurate, and easy to access.

Answers to specific questions

QUESTION 1: Do you agree with these principles?

These principles determine how ICSTIS intends to communicate with consumers. We agree with these general principles. The detail of the information ICSTIS intends to communicate will be key.

QUESTION 2: Are there other principles which you think we need to observe? If so, what are they?

No.

QUESTION 3: Do you agree that our contact centre should provide advice and assistance to consumers where this is requested? If not, how else, or who else, might fulfil this role?

BT believes that the ICSTIS contact centre should continue to provide advice and assistance to consumers. We welcome the steps that ICSTIS has taken to date to improve the effectiveness of its Helpline operations. As the OCP with the largest residential customer base, BT has worked with ICSTIS to try to align our processes so that our mutual customers receive the best possible experience for what can be a difficult enquiry.

OCPs like BT have recently taken on more responsibility for handling general PRS enquiries at the front line, providing information on PRS call tariffs and call barring and for dealing with number check queries where possible. BT's specialist advisers are able to discuss Internet diallers and ways of minimising exposure to problems, plus the role of Otelo, the Telecommunications Ombudsman. Ofcom is leading a working group to look at what information and service OCPs should offer their customers as a result of the Ofcom report on PRS regulation. (Recommendation 11.) BT is involved in this working group and the agreements reached here will need to dovetail with ICSTIS' activities in educating consumers.

At present OCPs' ability to provide information on the options for obtaining redress and Service Provider contact information are limited by access to appropriate information from the ICSTIS website.

An additional source of information could be Ofcom. Ofcom's website could have more information and it would be helpful if ICSTIS could consider approaching Ofcom to give more prominence to their role and the PRS industry on its website.

QUESTION 4: What thoughts or suggestions do you have on how the website could be a better consumer-facing interface?

BT applauds the recent developments to the web site, in particular the number-checking facility. There is a specific Ofcom/ICSTIS initiative (Ofcom PRS Review Recommendation 12) to assess the feasibility of building a central database of SP contact information that would likely also be made available on ICSTIS's website.

With specific reference to Directory Enquiries (DQ), the information held about individual 118 codes on the ICSTIS web site appears to be inconsistent. We would urge that the same level of detail provided for 09 numbers be provided for DQ services.

Clearer information on seeking redress from the providers of services would improve the customer experience. This is also the subject of one of the Ofcom PRS Review recommendations (Recommendation 7.) This could be done quickly.

BT would also suggest that ICSTIS consider a development to allow customers to update their complaint with further relevant information they might have.

QUESTION 5: Do you agree with the ICSTIS' proposed proactive work to support consumer information and education?

Generally yes, and BT would recommend that ICSTIS also consider a programme of education for the main Consumer Groups.

QUESTION 6: Specifically, do you agree that basic information about ICSTIS' role and remit should appear on telephone bills and/or be communicated to consumers by OCPs?

BT has for some time worked with ICSTIS on this matter. On our standard telephone bills we give information about ICSTIS which has been agreed with them.

The profile of PRS has been raised due to dialler issues over the last year or so, and the market for PRS is increasing. However, at present, PRS charges are not an item for the majority of our customers and therefore suggestions about inclusion of information in telephone bills must be proportionate to the risk involved, as well as recognising the very limited space available. BT believes that the information recently agreed for our

bills provides sufficient information and directs customers to the right place for further detail. For completeness, the agreed revised wording about PRS complaints is as follows:

If you have a complaint about premium rate services contact ICSTIS. These services start 09 for landline calls, 118 for directory enquiry services, or can be offered on four or five digit numbers on mobile phones.

www.icstis.org.uk

Secretariat, ICSTIS, FREEPOST WC5468, London SE1 2BR

QUESTION 7: What thoughts do you have on the best media to use to inform consumers about premium rate services?

Budget is an issue in any marketing operation and whilst the best media to inform consumers about premium rate services might be through a mix of print and broadcast media, ranging from national broadsheets and TV through to daytime television programmes, the costs involved will be a limiting factor. ICSTIS should continue to work with other organisations (e.g. Consumer groups, CAB, Trading Standards) to inform consumers. ICSTIS should also proactively seek opportunities to be involved in relevant conferences and events.

QUESTION 8: What thoughts do you have on how we might enhance our media reporting operation?

We support ICSTIS' current activities and suggest that additional proactive work might be considered, for example to exploit opportunities to share information in consumer/finance/lifestyle features in various media.

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