



Commission for
Communications Regulation

Submissions to Consultation

Scope of Premium Rate Services regulation

Submissions received from respondents

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10 Boltblue

Michelle Townshend
Commission for Communications Regulation
Irish Life Centre
Abbey Street Freepost
Dublin 1
Ireland

By Email: retailconsult@comreg.ie

14th May 2010

Dear Ms Townshend,

RE: Scope of Premium Rate Services regulation - ComReg 10/27

Introduction

Boltblue welcomes the opportunity to consult with ComReg on the regulatory challenges in the Mobile Subscription Services part of the premium rate services market and on how they should be effectively addressed to continue to build consumer confidence in mobile paid-for services.

Observations

It is evident that there are serious, significant problems that need to be addressed. Specifically against rogue operators of some paid-for services in particular, Internet advertised competition and prize draw subscriptions represent our chief concern regarding non-compliance. This specific issue is exacerbated and consumer confidence further damaged by the persistence of unsolicited third party messaging.

Please find here our responses to the questions raised within the Mobile Subscription Services portion of the consultation.

Response to Questions within "Mobile Subscription Services"

Question 17: Should ComReg introduce a "double opt-in" requirement for entry into a mobile subscription service.

Reference to the UK's introduction of "double opt-in" as being successful is misleading. There was a 16% drop in mobile outpayments across the entire Industry upon the introduction of the "double opt-in" in the UK with quarterly payments outpayments dropping below £60m for the first time since 2005. This 16% drop in the mobile outpayments masks the true story behind the "double opt-in".

Mobile subscription services represents approximately 30% of the total market for mobile. The others are, inter alia, Advice services, Betting tipster services, Virtual Chat services, Contact and Dating Services, Childrens services, Competition and other games with prizes, Consumer credit services, Directory enquiry services, Fundraising and charitable promotions, Pay-for-product services, Sexual entertainment services. These other services are not impacted by a "double opt-in". This means that the 16% drop in mobile outpayment is severally weighted by a fall in mobile subscription services. We estimate a drop in mobile subscription services of approximately 53% (being 16% times 100%/30%).

This means that the 50% drop in complaints is actually simply a reduction of subscriptions by 50% and what we've done is simply reduce the market size but not affected any beneficial regulatory change

on the market. Per capita, people are just as likely to be satisfied or not satisfied as before. The Complaints per capita have not changed.

We believe that the consultation document does not consider appropriately opt-in to Internet promoted subscription services. The current web and PIN process is a valid mechanism. The “double opt-in” is unnecessary for the following reasons:

- The regulations require that the advert contains details on pricing, frequency of charge, how to unsubscribe from the service, customer care details, age restrictions and SP information.
- This information is repeated in the terms and conditions at the footer of all advertisements
- The Terms and conditions must be visible without the need for scrolling.
- The customer receives a free of charge welcome message after sign up that confirms pricing, frequency of charge, age restriction information, customer care number and how to unsubscribe from the service.

Furthermore, the “double opt-in” would serve to confuse customers who might think they are making a second order. Asking the customer to submit a second MO will confuse and irritate as they are making an impulsive purchase and expect immediate gratification.

Our experience in other markets has been a market decline of 50% as a result of a “double opt-in” requirement. Customers are deterred by the requirement to submit a second MO for the following reasons:

- Over complicated mechanism
- Customer sees the ‘subscribe’ and ‘pricing’ information and does not realise they must send another MO to complete their order
- They believe they have completed their order and await their content not realising they must submit a second MO
- Users may incur additional charges

For Internet promoted services we believe web and PIN entry is equally valid, if not more so. For example if an end user receives an unsolicited message containing a unique PIN they first have to go online, type the URL, input the password having presumably seen the terms before subscribing. In fact, when a user receives an unsolicited text they are more like to reply OK (without having read the terms and conditions).

For these reasons we recommend that web and PIN remains a valid opt-in for Internet promoted services (provided the message does not reference the original website).

Question 18: Should ComReg prohibit the use of MT Billing (reverse billed SMS) by PRS providers? Should MT billing be permitted only for certain types of services?

We disagree with ComReg taking a position that the business model of subscription based services should or could fairly be prohibited. The argument that a subscription service for buying ringtones, music downloads, jokes or competitions can be provided by the user periodically texting “go” or “continue” to a short code is not only unfair to this particular type of service (vis-à-vis other mobile services) but makes the service economically unviable. Further, there is no clear logic proffered by the Writer regarding where such a line would be drawn. The Writer proposes that it is possible to have a MO alternative and “If there is such a demand, then it could still be met by some form of a regular payment based on MO-payment (where the consumer is charged for sending a text)”.

We do not believe this is a reasonable position to hold. This restriction, if enacted, would unfairly prejudice particular services (as all services can be re-cast into a MO-payment including the Writers example of sports data (see side bar Sports Data on MO below) or make the business model uneconomical. We would suggest that if ComReg believes strongly in this proposal, then detailed analysis by an Economist is an absolute necessity and their finding should separately form part of a consultation and/or review by Industry.

The single most important benefit of PSMS is the ability to consume spontaneously information and entertainment services. Let's not kill the Industry or parts thereof in an attempt to achieve particular goals. Dictating consumer choice and restricting market innovation is not the way forward.

We also do not agree with the assessment regarding the risks of using subscription billing. We argue that the customer has full control over their payments.

Sports Data on MO

Sports alerts could also be offered on a MO only subscription, whereby before each match a user is prompted to text in an MO message to get alerts for that match.

Indeed, any service could be easily converted into an MO service. However, ComReg must recognize the impact of the barriers that they are proposing to put in front of the user.

- The regulations require that the advert contains details on pricing, frequency of charge, how to unsubscribe from the service, customer care details, age restrictions and SP information.
- This information is repeated in the Terms and conditions at the footer of all advertisements
- The Terms and conditions must be visible without the need for scrolling.
- The customer receives a free of charge welcome message after sign up that confirms pricing, frequency of charge, age restriction information, customer care number and how to unsubscribe from the service.
- The customer receives a free spend reminder which confirms pricing, frequency, age restrictions, customer care number and opt-out instructions.
- Opt out is possible at anytime.

Any subscription service, which is not transparent, risks causing consumer harm. This largely relates to a few rogue services (in particular competition, IQ test and prize draw services), which should be dealt with through existing regulation and sanctions. The regulatory principle should be that the consumer is clearly informed of the price and billing frequency of the service before purchase and not dictating the service type or design.

Q19. Should ComReg prohibit the use of “invisible” reverse billed (MT) SMS by PRS providers.

Under no circumstance should a consumer incur charges without first being fully aware of the cost and frequency. We strongly believe that this does not require further regulation. The Code of Practice has adequate provision to require that pricing is clear, transparent and notified prior to being incurred.

Q20. Should ComReg prohibit chargeable messages being stored-up” for delayed sending, when a prepaid account is out of credit.

Prohibiting chargeable messages being stored-up for time sensitive services such as weather forecast or football score alerts when the content would be out of date before it was delivered is a sensible measure. For services that are not time sensitive such as for buying ringtones, music downloads, mobile games, etc. we do not believe storing up should not be prohibited. We do support a maximum limit of messages that may be queued however and suggest that a €30 limit would be reasonable.

Q21. Should MNOs in Ireland be required to provide all customer with the option of barring premium calls and/or barring consumer access to premium SMS/MMS, whether on an outgoing (MO) or incoming (MT) basis?

The document suggests that the vast majority of these transactions occur without any consumer harm. In fact, there has not been a general failure that warrants the introduction of such a capability, rather a small number of rogue providers who consistently breach the regulations undermining the reputation of industry. We favor a consistent approach to dealing with these rogue providers. Introducing the capability to bar access to premium services would be a punishment for providers with a good record.

Q22. Should ComReg restrict the class, or type, of service that can operate a subscription payment model?

No there should not be a restriction. Subscription services allow providers to offer content as much lower rate (sometimes unlimited) than can be offered on a one off pricing model. The opt-in, opt-out nature of subscription services also allows customer to dip in and dip out to get the best value. Any subscription service, which is not transparent, risks causing consumer harm. The regulatory principle should be that the consumer is clearly informed of the price, frequency and nature of the service before purchase and not restricting the class and type of service that can operate.

Conclusions

In summary, we strongly believe that further regulation as outline is not required. There is probably sufficient regulation in place already and adequate provision to deal with rogue providers. It is our view that there are a small number of services, which cause the majority of the problems. The issue therefore is one of enforcement rather than regulation. This proposal will negatively impact providers of legitimate services.

Finally we suggest that when ComReg has had the opportunity to consider all Consultation responses they convene a "roundtable" discussion where findings can be openly discussed before any conclusions are reached and further announcements are made.

Yours truly,

A handwritten signature in black ink, appearing to read 'Luc Wade', with a large, stylized initial 'L'.

Luc Wade
Marketing Director

11 Bongo Operations Pty. Ltd.

From: Andrew Smith
Sent: 14 May 2010 10:05
To: retailconsult
Cc: Domenic Carosa
Subject: IPPSA submission to ComReg

To Whom It May Concern

Bongo, an Australian mobile premium service provider operating in Ireland, wishes to endorse and support the submission to ComReg from the Irish Phone Paid Services Association.

We believe that Ireland will be left behind the world in the development of a competitive & innovative mobile marketplace, with the restrictions proposed by ComReg dissuading international investment in operating mobile services in Ireland.

Recent regulatory changes in Australia, aimed at stamping out unscrupulous operators, have harmed mobile innovation without the benefit of removing these unscrupulous service providers, as Australia does not require providers to be licensed.

Ireland has the opportunity to stamp out renegade operators by better utilizing its licensing process, in combination with greater monitoring and enforcement. The proposed elimination of MT billing and product categories of subscription services may stamp-out some rouge operators, but will be at the expense of harming legitimate service providers.

Please see our responses to questions poised about subscription services below:

Q. 17. Should ComReg introduce a “double opt-in” requirement for entry into a mobile subscription service?

No. The introduction of a double opt-in in Australia has had a negative impact on innovation in the mobile space. In addition, our experiences in Australia have found that a double opt-in is confusing to customers and leads to a poor customer experience.

Q. 18. Should ComReg prohibit the use of MT billing (reverse-billed SMS) by PRS providers? Should MT billing be permitted only for certain types of services?

No. MT billing is a viable and useful tool for both customers and service providers in allowing ongoing and seamless relationships to exist between the two parties. Furthermore, MT billing should be offered on a level playing field to licensed and compliant parties.

Q. 19. Should ComReg prohibit the use of “invisible” reverse billed (MT) SMS by PRS providers?

Invisible SMS services, to the best of our knowledge, are not currently available in Australia, nor have we had any experience in this service in Ireland. As such, we would not deem it appropriate to answer this question.

Q. 20. Should ComReg prohibit chargeable messages being “stored-up” for delayed sending, when a pre-pay account is out of credit?

Yes. Customers who have willingly subscribed to a subscription service should still be allowed to participate in that service once they have re-credited their account.

Q. 21. Should MNOs in Ireland be required to provide all customers with the option of barring premium calls and/or barring consumer's access to Premium SMS/MMS, whether on an outgoing (MO) or incoming (MT) basis?

No. A blanket ban on all premium numbers and/or premium SMS will harm consumers who may currently be unhappy with a rouge providers offering, but will want to participate in premium SMS services in the future,

Q. 22. Should ComReg restrict the class, or type, of service that can operate a subscription payment model?

No. Any service provider who is licensed as remains compliant with Irish regulations should not be discriminated against based on a class or type of service.

Domenic Carosa
Bongo Operations Pty Ltd

12 BT Communications Ireland Ltd.



BT Communications Ireland Ltd (“BT”)

Response to

**ComReg’s consultation in the Scope of Premium Rate Services
Regulation Reference 10/27**

14th May 2010

1.0 Introduction

BT welcomes this consultation. With the recent transfer of regulatory responsibility to ComReg and the imminent enactment of new legislation we believe that this is the right opportunity for a new regulatory framework to be created for the PRS market.

PRS is an area of e-communications that can if appropriately regulated provides consumer benefit. However, due to its various characteristics, as set out by ComReg in the consultation, it can also present a number of difficulties for consumers and operators if it not appropriately regulated.

We agree that there should be a mandatory code of practice and in the main we agree with all the proposals made by ComReg and have only commented below where our views differ.

An area where we would advocate caution so as not to stifle the innovation of future services concerns alternative payment methods where originating service providers offer billing services to retailers. Our concerns are two fold in this area:

- Firstly to ensure that any new regulatory remedies are cognisant of existing consumer legislation such as distance selling, and also of financial regulation. Proposals should not duplicate or contradict existing regulations as such would create uncertainty in the market.

- Proposals should strike an appropriate balance of protecting consumer welfare whilst allowing market development and investment in Ireland inc.

2.0 List of Questions

Q. 1. Do you agree with ComReg's preliminary view that twenty cents (€0.20) retail cost per minute/per call/per text is a reasonable price threshold below which certain services may be exempted from licensing?

A.1. We agree with the ComReg view that twenty cents (€0.20) retail cost per minute/per call/per text is a reasonable price threshold below which certain services may be exempted from licensing as such services are of a low financial impact etc. For clarity and certainty for investment decisions it would be helpful to have a clear view either of what falls within regulation or what does not.

Q. 2. Do you agree with ComReg's intention to regulate live services?

A.2. We agree.

Q. 3. Do you agree with ComReg's intention to regulate PRS services of a sexual nature, irrespective of cost?

A.3 We agree in order to protect vulnerable customer groups such as minors.

Q. 4. Do you agree with ComReg's intention to regulate competition services?

A.4. Given recent customer experiences and current bad debt issues within the market concerning certain competition services we agree.

Q. 5. Do you agree with ComReg's intention to regulate children's services, irrespective of cost?

A5. We agree to protect the welfare of this group.

Q. 6. Do you agree with ComReg's intention to regulate fundraising and charitable donations made through a PRS?

A.6. We agree to avoid inadvertent consumer distress and to protect against organizations that may achieve charitable status as a potential loop hole to avoid regulation.

Q. 7. Do you agree with ComReg's intention to regulate internet dialer software, irrespective of unit cost?

A.7. We agree. Although less prevalent today with the advent of broadband, this issue caused considerable customer distress and complaints in the past. The problems of certain internet dialer software, often described as 'scams', are still possible as most computers now have built-in PSTN access ports which some customers still use for fax and back-up dial up internet services. Hence the potential for the theft of personal data, and finance still exists although now on a smaller scale. BT would agree with ComReg that customers are often unaware of the scam until well after the event. BT supports ComReg's proposal.

Q. 8. Do you agree with ComReg's intention to regulate virtual chat, contact and dating services, irrespective of cost?

A.8. We agree.

Q. 9. Do you agree with ComReg's intention to regulate pay-for-product services?

A.9. An area where we would advocate caution so as not to stifle the innovation of future services concerns alternative payment methods where originating service providers offer billing services to retailers. Our concerns are two fold in this area:

- Firstly as ComReg touches on within clause 7.5 our view is that new regulatory remedies should be cognisant of existing consumer legislation such as distance selling and also of financial regulation. Proposals should not duplicate or contradict existing legislation as such would create uncertainty in the market for consumers and investors. Therefore it would be helpful as part of any regulatory package for ComReg to point to the appropriate legislation where appropriate rather than to attempt to duplicate or amend it. If there is any gap in consumer protection the appropriate Regulator ought to address that rather than COMREG expanding its own remit. ComReg used this approach effectively for its publications following the removal of the Customer Codes of Practice for Local Loop Unbundling.
- Proposals should strike an appropriate balance of protecting consumer welfare whilst allowing market development and investment in Ireland inc.

Q. 10. Having due regard for the issues raised above, do you consider ComReg should regulate MNO's "on-portal" services as "Specified PRS"?

A.10. We don't see a need to add further obligations above those that already exist.

Q. 11. Do you agree with ComReg's proposal that certain categories of services could be exempted from regulation, provided the cost is below the proposed 20 cent (€0.20) price threshold?

A.11. Please see response to Q 1.

Q. 12. Do you consider that ComReg should regulate Directory Enquiry services, within their current remit, as specified PRS?

A.12. See Q13.

Q. 13. Do you consider that DQ services, within their current remit, could be exempted from regulation, provided their cost is below the recommended price threshold? (Refer to Paragraph 7.5)

A13. Yes given the price threshold.

Q. 14. Do you consider that it is preferable to maintain the current clear focus of 118XX on strictly telecommunications directory services or should it be permitted to expand to allow a diverse range of "general information services" and, therefore, become subject to PRS regulation?

A.14. We generally don't see a need to regulate the existing 118XXX services below a threshold unless there is significant evidence of consumer welfare issues and we are agnostic concerning these providers being allowed to widen their portfolio of services. However where providers widen their portfolio of services then where such new services would be normally regulated, appropriate regulations should apply and other services should be absent regulation until there is a clear demonstration of consumer welfare problems or a clear justification of expected problems.

The only issue that jumps from the page is price transparency and if voluntary codes of practice or standard business practice do not ensure such transparency then we believe a pre-call announcement should be a sufficient remedy.

Q. 15. Do you consider that the provision of general information services by DQ SP's would be unfair to „ordinary SP's of similar services or does the option for them to provide DQ services mitigate this?

A15. We do not see an issue.

Q. 16. Do you consider it appropriate to delineate the additional “general information” services that would be acceptable on 118XX short codes where prior approval by ComReg would be required on a case-by-case basis?

A.16. Yes, it would be helpful to delineate services so that customers have an appreciation of the potential cost of the call and the service to expect.

Q. 17. Should ComReg introduce a “double opt-in” requirement for entry into a mobile subscription service?

A.17. No further comment.

Q. 18. Should ComReg prohibit the use MT billing (reverse-billed SMS) by PRS providers? Should MT billing be permitted only for certain types of services?

A.18. No further comment.

Q. 19. Should ComReg prohibit the use of “invisible” reverse billed (MT) SMS by PRS providers?

A.19. No further comment.

Q. 20. Should ComReg prohibit chargeable messages being “stored-up” for delayed sending, when a pre-pay account is out of credit?

A.20. No further comment.

Q. 21. Should MNOs in Ireland be required to provide all customers with the option of barring premium calls and/or barring consumer access to Premium SMS/MMS, whether on an outgoing (MO) or incoming (MT) basis?

A.21. No further comment.

Q. 22. Should ComReg restrict the class, or type, of service that can operate a subscription payment model?

A.22. No further comment.

Q. 23. Do you agree with ComReg's recommendation in relation to cancellation of subscription services and marketing opt-ins when an account expires or the number is quarantined?

A.23. Given past problems we agree with ComReg's proposal.

End

13 Cable & Wireless Worldwide

WORLDWIDE HOUSE, WESTERN ROAD, BRACKNELL BERKSHIRE, RG12 1RW
TEL +44 (0) 7800 021 512 [WWW.CW.COM](http://www.cw.com)

MS. MICHELLE TOWNSEND
COMMISSION FOR COMMUNICATIONS REGULATION
IRISH LIFE CENTRE
ABBAY STREET
FREEPOST
DUBLIN 1
IRELAND

Cable&Wireless
Worldwide

13 May 2010

Dear Ms. Townsend,

Re: Scope of Premium Rate Services regulation – ComReg 10/27

Cable&Wireless Worldwide is one of the world's leading international communications companies. Cable&Wireless Worldwide provides enterprise and carrier solutions to the largest users of telecom services across the UK and the globe. With experience of delivering connectivity to 153 countries – and an intention to be the first customer-defined communications service business – the focus is on delivering customers a service experience that is second to none. More information on Cable&Wireless Worldwide can be found at: <http://www.cw.com/>

We are a large network supplier of Number Translation Services (NTS) and Premium Rate Services (PRS) in the UK, supporting the many businesses and organisations that rely on these services to communicate with their customers. We provide, albeit on a smaller scale, similar PRS in Ireland.


Cable&Wireless Worldwide welcomes this opportunity to respond to ComReg's consultation on the scope of PRS regulation whilst looking forward to ComReg's consultation on the Code of Practice that is intended to be published in July 2010 which will address "how" the market will be regulated.

From the outset we would like to point out that we fully support ComReg's view of its intention to "focus the regulatory arrangements on those areas which hold

a higher potential for consumer harm, and conversely, to take a proportionate approach to services that pose less risk.”

Please find attached our answers in response to the various questions raised in the consultation paper.

Yours sincerely,



Jean Pierre Scerri

Head of Regulatory Affairs Southern Europe

Question 1: Do you agree with ComReg's preliminary view that twenty cents (€0.20) retail cost per minute/per call/per text is a reasonable price threshold below which certain services may be exempted from licensing?

Cable&Wireless Worldwide does not disagree with ComReg's preliminary view although we note that the proposed threshold is lower than the per-minute price of a local or national call from a public phone and therefore we wonder whether it would be more appropriate to raise the threshold by €0.05 to €0.25 and thereby peg the definition of PRS to the price of a national call from a public phone.

Question 2: Do you agree with ComReg's intention to regulate live services?

Yes, we agree with ComReg's intention to regulate live services.

Question 3: Do you agree with ComReg's intention to regulate PRS services of a sexual nature, irrespective of cost?

Section 3 of the Communications Regulation (Premium Rate Services and Electronic Communications Infrastructure) Act 2010 defines PRS as having all of the following characteristics:

- (a) it consists in the provision of the contents of communications (other than a broadcasting service) through an electronic communications network or by using an electronic communications service, which may include or allow the use of a facility made available to the users of the service,*
- (b) there is a charge for the provision of the service which exceeds the cost attributable to communications carriage alone, and*
- (c) the charge referred to in paragraph (b) is paid by the end user of the service directly or indirectly to the provider of the electronic communications network or electronic communications service*

used in connection with the provision of the service by means of a billing or other agreed payment mechanism.

It is therefore clear that for a service to qualify as a PRS, (and therefore potentially regulated) that service must attract a charge that, as a minimum, must exceed the cost of the communication carriage alone.

Section 7(1)(a) in turn obliges ComReg to make regulations specifying the or type of PRS which require to be licensed. Consequently, ComReg can only regulate those services that satisfy the above-mentioned three characteristics and which are therefore classified as PRS. It therefore follows that ComReg is not empowered to regulate services irrespective of the cost.

Whilst in principle we would agree with ComReg's proposal, we would point out that ComReg's intention to regulate such services can only materialise to the extent that such services are classified as PRS according to the definition at law.

Question 4: Do you agree with ComReg's intention to regulate competition services?

Yes, we agree with ComReg's intention to regulate competition services.

Question 5: Do you agree with ComReg's intention to regulate children's services, irrespective of cost?

Please refer to our response to Question 3 above.

Question 6: Do you agree with ComReg's intention to regulate fundraising and charitable donations made through a PRS?

Yes, we agree with ComReg's intention.

Question 7: Do you agree with ComReg's intention to regulate internet dialler software, irrespective of cost?

Although we are happy to note that the risk of such fraud is diminishing with always-on broadband connections replacing dial-up, we agree with ComReg's proposal, subject to the constraints set out in our answer to Question 3 above.

Question 8: Do you agree with ComReg's intention to regulate virtual chat, contact and dating services, irrespective of cost?

Please refer to our response to Question 3 above.

Question 9: Do you agree with ComReg's intention to regulate pay-for-product services?

Whilst we do not disagree with ComReg's intention, our view is that such services may best be regulated by the applicability of general consumer law provisions.

Question 10: Having due regard for the issues raised above, do you consider ComReg should regulate MNO's "on-portal" services as "Specified PRS"?

We believe that these services might be more effectively regulated via general consumer law provisions and e-commerce legislation.

Question 11: Do you agree with ComReg's proposal that certain categories of services could be exempted from regulation, provided the cost is below the proposed 20 cent (€0.20) price threshold?

We agree in principle that, in order to reduce administrative burden on the industry, certain categories of PRS should be exempt from licensing where there is no possibility of consumer harm. In our view, however, the threshold should, as a minimum, be increased to mirror the cost of a local or national call from a public telephone.

Question 12: Do you consider that ComReg should regulate Directory Enquiry services, within their current remit, as specified PRS?

We fail to see why Directory Enquiry services should be treated any differently from other services that likewise satisfy the three criteria set out in Section 3 of the Act and therefore agree that ComReg should regulate Directory Enquiry services as specified PRS.

Question 13: Do you consider that DQ services, within their current remit, could be exempted from regulation, provided their cost is below the recommended price threshold?

Yes, to the extent that the cost of DQ services are below the recommended price threshold, then such services could be exempted from regulation.

Question 14: Do you consider that it is preferable to maintain the current clear focus of 118XX on strictly telecommunications directory services or should it be permitted to expand to allow a diverse range of "general information services" and, therefore, become subject to PRS regulation?

In our view, the position expounded in the first National Numbering Conventions concerning 118XX codes is still valid. We would therefore advocate for maintaining the current focus so that DQ services should not be extended beyond services with a direct telecommunications remit. However, should ComReg decide to go ahead with its proposal, then we would urge ComReg to consider whether the general public have an expectation (and therefore a perception) that such codes will continue to be reserved for purely telecommunications directory services and accordingly analyse whether any sudden switch might result in consumer harm.

Question 15: Do you consider that the provision of general information services by DQ SP's would be unfair to ordinary SP's of similar services or does the option for them to provide DQ services mitigate this?

Cable&Wireless Worldwide does not have a definite view on this.

Question 16: Do you consider it appropriate to delineate the additional “general information” services that would be acceptable on 118XX short codes where prior approval by ComReg would be required on a case-by-case basis?

In the event that ComReg decides to extend the 118XX code to other “general information” services, then yes we would agree to this proposal as it would serve to provide legal certainty.

SECTION 9 - Questions 17 to 23

Cable&Wireless Worldwide does not provide mobile voice services or mobile subscription services and as such we do not have a definite position in answer to these questions.