

Consultation on Draft BEREC Report on Special Rate Services

Response from the International Telecommunications Users Group (INTUG)

INTUG is pleased to contribute a brief response to the consultation on BEREC's draft report on Special Rate Services, which is significant to certain sectors of business users, both as service providers, and as substantial users. The specific areas of concern which business users have are as follows:

- As with many other communications services within the Single Market, there is significant inconsistency in the provision of Special Rate Services between different Member States, both in terms of numbering plans and charging principles.
- Charging principles and structures, as in the analysis within the draft report, are also extremely complex and confusing, making costs for use and provision of Special Rate Services internationally unpredictable, costly, and a barrier to trade.
- Special Rate Services, like Roaming Charges and Termination Rates, do not easily lend themselves to structural solutions, which could introduce competition as a means of reducing end costs at wholesale and retail level, rather than price caps.
- As many users contract for service bundles for fixed and mobile services, inclusion or exclusion of access to Special Rate Services becomes a significant cost issue.
- International provision of Special Rate Services must not suffer the drawbacks and failures linked to International Freephone, which was not implemented universally or successfully in Europe, which is sometimes blocked on mobile networks or not free, and which is still a required business service, nor those of the failed +3883 EU code
- Since convergence of fixed and mobile access is inevitable, and in many countries, for example in Eastern Europe, most private telephony is mobile, there must be no penalty for accessing Special Rate Services or Freephone Services from mobiles.
- Whilst the reputation of Special Rate Services has been damaged by association with "adult" service content, TV Show voting, fraudulent scams and excess revenue generation by long call hold times using multiple layer menus, they do provide vital facilities for business and residential users, such as directory enquiry, and must not therefore incur tariffs inflated by excessive costs levied by originating operators.

Queries concerning this response should be addressed to:

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