

RFI WORKSHOP

1st May 2014 | PhonepayPlus Offices, Maguire Street, London | 10.00 – 12.30

ATTENDEES:

David Ashman – AIME (Chair)
Chris Bennet – PhonepayPlus
Eric Feltin - Safari Mobile
Melissa Fernandes –mGage
Brian Gilsean - Zamano
Alex Littlemore – PhonepayPlus
Alan Partington – Telecom2
Mike Pemberton – PhonepayPlus
Jo Prowse – PhonepayPlus
Jimmy Wing - Cellcast

SUMMARY OF KEY AGREEMENTS:

- New individual reports are to be made available to Aggregators and APIs (L1's), in both a weekly and monthly format, detailing consumer contacts and case status
- L1s will receive an email update for every RFI concerning their clients services, along with case closure notifications (facility to suppress these notifications available)
- Details of the consumers complaint will be summarised with the RFI (commencing late May)
- Case closure notification will be issued as standard to RFI recipients and PhonepayPlus are investigating why this is not currently occurring
- Multiple shortcodes used in a single service can be linked to prevent duplicate RFIs (subject to the provider informing PP+ of the relationship)
- PhonepayPlus to review correspondence sent to consumers to ensure these are neutral in tone
- AIME will further investigate demand for a template RFI response format (this is an alternative; no change for Providers with a satisfactory response format would be necessary)

NOTES

Current Issues reported by members

- Concerns reported to AIME were broadly summarized as:

- RFI volume and duplication
- Disconnect between RFI and consumer complaint; or delay issuing RFI
- Breakdown in communication of status of the case following RFI
- Lack of clarity as to the triggers for RFIs and further investigations

PP+ overview of:

1. Triggers for RFIs
 2. Purpose of RFI being issued
 3. What prompts an RFI to be escalated to an investigation
 4. What is Feedback to consumers
 5. How long should provider keep consumer usage data
- 50% of contacts logged as a complaint, running at approx 3k per month, e.g. where PP+ can identify the service (charity donation, x-factor etc).
 - Where PPP can't identify the service, typically due to shared short codes, they will go down the RFI process
 - Approx 50% of RFI gets closed down after receipt of the RFI response - e.g. PP+ deem it to be a compliant service
 - Where PP+ is provided with compelling evidence of consumer interaction with a compliant service, e.g. screenshots, this will be verbally communicated to the consumer and the case will be closed
 - Of the 50% of RFIs that can't be closed they go into the complaint resolution team and they are assessed to see if they are in breach of the code.
 - Complaints are dealt with through an RFI, contacts are not dealt with as RFI.
 - Complaint defined as where consumer has expressed dissatisfaction with a service they have either engaged with or observed.
 - PhonepayPlus request evidence from consumers to substantiate a complaint. Including copy of the receipt and marketing messages and a copy of the consumer's bill. Consumers are sometime reluctant to supply this. PhonepayPlus will investigate irrespective of receipt of evidence.
 - Consumer has not always transacted; complaint may be in response to the promotion alone
 - PP+ own initiative investigation may sometimes prompt an RFI; these investigations will now follow the same process as a consumer complaints (though source will be made clear)
 - PPP should deal with all RFIs within a 6 week period. Either PPP will progress to a service review / Track 1 / Track 2 or they will close it off.
 - PP+ will normally only carryout a cursory investigation of the service in the first instance and close the case if service appears compliant ; significant volume of complaints may result in the case being reopened for more detailed investigation e.g. exploration of alternative consumer journeys etc (closure of an RFI does not constitute PP+ compliance approval)
 - Clarity was sought on how long a provider is expected to hold data for after the last consumer interaction; initial view was that after a period of 12

months there would be no expectation that provider continues to hold the data (PP+ required legal advice before confirming this as policy)

- PP+ will review the wording of correspondence sent to consumers in light of provider concerns that current tone lacks neutrality

General Discussion:

Strategy to manage the volume of RFIs

- Once an RFI has taken place on a service, future complaints will not result in a further RFI
- Where multiple numbers are associated with the same service, providers can notify PP+ to enable a link to be made on the database (there may be duplication prior to this taking place)

Standardising RFI responses:

- AIME reported that the RFI template discussed at the previous Roundtable had been circulated to Members for feedback
- Some Members are satisfied with the current process and do not require any changes
- The template may still be helpful for L2s and AIME will take further soundings
- If the template is introduced this should be in addition to the response formats that are currently working for some L1s

Improving the communication of case status

- PP+ can send an individual email report on each RFI and / or weekly / monthly report with a summary of the status of all RFIs.
- Investigations team should already be sending a notification of case closure, or informing providers of case escalation, within the 6 week window;
- PP+ will investigate why this is not taking place consistently
- Providers to check and feedback where this is not occurring to aid the investigation
- Commencing later this month, the reason for the complaint will be provided on the RFI (provided the consumer has given permission), as well as inclusion in the weekly report.
- RFI on a call complaint should be sent out within 24 hours.