



Commission for
Communications Regulation

Revocation of Premium Rate Service Licence

RA Link Solutions Ltd.

Information Notice

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Context and Background

1. RA Link Solutions Ltd. (“RA Link Solutions”) was a licensed premium rate service (“PRS”), provider in Ireland, in accordance with Section 6(1) of the Act of 2010 and Regulation 4 of the Communications Regulation (Licensing of Premium Rate Services) Regulations, 2012.
2. RA Link Solutions’ PRS is an online business directory and connection PRS which:
 - a. provides consumers with “alternative” customer service and helpline telephone numbers for various businesses, and
 - b. connects consumers to the actual customer service and helplines of the company they wish to speak to while charging them a premium rate for their call.

The service operates by providing consumers not with the actual customer care number they require but with alternative premium rate numbers, which, if dialled, will connect consumers to the customer service/helpline of the company they actually want to speak with while charging them a premium rate for the connection, typically €2.95 per minute.

Investigation

3. Following an investigation into the RA Link Solutions online business directory and connection PRS, on 11 December 2014¹, ComReg notified RA Link Solutions of findings² that it had not complied with certain provisions of the Code of Practice³ for PRS providers (“the Code”) and the Communications Regulation (Licensing of Premium Rate Services) Regulations, 2012⁴ and, therefore, was in breach of conditions of its PRS licence⁵;
 - a. ComReg found that some end users were not notified of the applicable charges upon connection to the PRS.
 - b. ComReg found that end users did not have their calls to the PRS terminated when they had incurred a cost of €60.

¹ In accordance with Section 17(1) of the Act, 2010

² In accordance with its powers at Section 9 of the Act of 2010

³ http://www.comreg.ie/_fileupload/publications/ComReg1445.pdf

⁴ http://www.comreg.ie/_fileupload/publications/SI_111_of_2012.pdf

⁵ RA Link Solutions is a licensed PRS provider in Ireland, in accordance with Section 6(1) of the Act of 2010 and Regulation 3 of the Communications Regulation (Licensing of Premium Rate Services) Regulations, 2010

- c. ComReg found that some end users may have been misled by inaccuracy, ambiguity, exaggeration, omission or otherwise which is contrary to the provisions of the Code of Practice. In this regard certain promotions for the PRS included logos and promotional content for the businesses that end users of the PRS wished to contact and, therefore, misled or had potential to mislead end users into believing that they were directly calling the businesses' consumer care helplines rather than a premium rate service that connected them to the relevant helplines.
 - d. ComReg found that during the course of its investigation RA Link Solutions did not comply with all information requests made by the Commission and had not provided true and accurate information to ComReg.
4. The Findings of Non-Compliance were published on www.phonesmart.ie and, RA Link Solutions was required to make a commitment to remedy the non-compliance, to provide ComReg with a complete list of affected end users and to make the refunds to end users connected to the non-compliance within the timeframes set out by ComReg.

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5. RA Link Solutions failed to provide ComReg with the list of all end users connected to the non-compliance, and the amount that these end users were due to be refunded and make the said refunds within the specified timeframe. Therefore, ComReg, in accordance with Section 10(2) of the Act of 2010, has revoked the RA Link Solutions' online business directory and connection PRS licence. The provisions of a revoked licence continue to apply and have effect in relation to any application for a premium rate service licence where RA Link Solutions Ltd. is involved in the provision of the service.

Further Information

6. RA Link Solutions Ltd. Findings of Non-compliance can be found at the following link http://www.phonesmart.ie/uploads/files/14_004.pdf
7. PRS Licence amendments, suspensions and revocations can be found at the following link http://www.phonesmart.ie/Code_of_Practice/133#.VjnqmGdyaHt