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**From:** DAVID STAFFORD [<mailto:d.stafford@btinternet.com>]

**Sent:** Wednesday, November 02, 2011 1:36 PM

**To:** INFISO BEREC

**Subject:** Draft BEREC Work Programme 2012 - contribution from the EIDQ Association

Please find attached contribution for your consideration with regard to the draft BEREC Work Programme for 2012.

This position paper highlights the retail margin mark-ups applied by Mobile Network Operators (MNOs) to Directory Enquiry (DQ) services as an area of concern in order to establish that the issue is of sufficient concern that regulatory intervention is required.

The EIDQ Association (The Association for the Directory Information and Related Search Industry) has formally adopted this position paper and is in the process of highlighting the concerns of members to European regulators, officials and politicians. We should like to take this opportunity to influence European regulators through the work BEREC is doing to investigate network (mainly mobile) origination charges for 'value added services'.

EIDQ wishes to express its strong support for item 4.6 'Access to special rate services' in the work programme. Directory services are an important element of this market sector and in some member states suffer significant harm as a result of the high origination fees referred to in the work programme (particularly on mobile networks). The resulting high retail charges are having a seriously detrimental impact, not only on consumers who pay them, but also on the longer term viability of the directories market which is already facing huge challenges. If action is not taken to control these origination fees, the future of the directories market in some member states is at real risk, which will create serious difficulties for consumers (particularly those without internet access) who rely on it.

We understand there is a risk that the BEREC Plenary of 8-9 December may not vote to approve the publication of a consultation on this aspect of Value Added Services. This would be of great concern to EIDQ's members and we would therefore like to stress the importance of BEREC continuing actively to address this issue, in order to ensure that individual NRAs are encouraged to investigate.

Would you kindly acknowledge receipt of this contribution, please.

Many thanks

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