

**Body of European Regulators for  
Electronic Communications – Draft BEREC  
Report on the handling of third-party  
payment charges on mobile phone bills**

**Response from Three Ireland**

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**Three.ie**

Three Ireland welcomes the BEREC draft Report on the handling of third-party payment charges on mobile phone bills and the opportunity to respond.

Three Ireland, similar to other mobile operators allow third-party providers to charge their customers via their mobile phone bills for goods or services. Such charges can apply to:

- Premium Rate Services (PRS) offered by phone call or by text message which are usually charged at higher rates than those normally applied to phone calls and text messages.
- the purchase of goods and services by Direct Carrier Billing (DCB) - where a mobile phone user is charged for a good or service on their mobile phone bill.

The draft BEREC Report contains a useful assessment of the topic. However, Three Ireland would caution that innovation should not be unduly stifled.

Three Ireland has had recent experience in Ireland of launching content services which are paid for by customers by way of DCB. In Ireland, these content services are treated as PRS. The existing regulatory framework and in particular the Code of Practice for PRS in Ireland does not neatly fit the DCB services being offered and calls out for a review to modernise it in this regard.

Three Ireland is concerned that over regulation of DCB or trying to ensure that it fits within the existing PRS regulation could leave to innovation being stifled. Many of these new DCB arrangements involve partnerships between the operators and respected digital content providers. It is important that regulatory requirements can be communicated clearly at the outset so that propositions and IT builds can be tailored accordingly and can plan timing for go to market.

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