

Proposals for guidance on the use of “Unlimited” claims in telecommunications advertising

CAP and BCAP Consultation

**CAP and BCAP Consultation
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1. Background

The Review

- 1.1. The Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP), authors of the UK Advertising Codes, are reviewing “up to” broadband speed and “unlimited” claims (“the Review”) with the aim of issuing guidance to the industry.¹
- 1.2. CAP and BCAP consider that the complexities of the evolving communications market now necessitate broader consideration of these issues than would otherwise be possible through an ASA investigation into an advertisement for a particular service. Although the two issues are related, each is subject to a separate consultation.
- 1.3. In addition, Ofcom, the Department of Business Innovation and Skills (BIS) and consumers have expressed concern at potentially misleading advertising of broadband speeds and “unlimited” claims for communications services that are subject to a fair usage policy (FUP). Broadband speed claims are an important descriptor of broadband services and “unlimited” claims tend to describe telephony and broadband services intended for heavier users.

Pre-consultation

- 1.4. In June and July 2010, CAP and BCAP conducted pre-consultation with several key organisations and Ofcom. The objective was to develop a better understanding of the issues, including the technological factors affecting them. Several telecommunications providers acknowledged concerns about the ASA’s present position on “unlimited” claims and tended toward the view that consumer expectations and technological constraints opened the way for the ASA’s policy to be reconsidered.

The Consultative Process

- 1.5. CAP and BCAP’s objective is to produce guidance for the industry on how to interpret the Misleading Advertising sections of the respective Advertising Codes in relation to “unlimited” claims as they appear in both consumer and business-to business-advertising. The guidance will take the form of a Joint Help Note for broadcast and non-broadcast advertising.
- 1.6. CAP and BCAP are not required to consult on guidance, but have decided to do so in the interests of transparency and the desire to ensure that industry and consumer perspectives are given the fullest consideration. Responses have been directly invited from a cross-section of interested parties representing both consumers and the industry.
- 1.7. CAP and BCAP undertake to look at each response carefully and with an open mind. A post-consultation evaluation will respond to all significant comments and will be published on the CAP and BCAP website, www.cap.org.uk.
- 1.8. The proposals for guidance outlined in Section 4 will be subject to a consultation, which will close at **5pm on Friday 25 February 2011**. For more information on the next steps in the Review see Section 5 and for full details of how to respond to the consultation, please see Annex 1.

¹ Copies of the full Codes are available on the CAP website: The [UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing](#) (the CAP Code) and the [UK Code of Broadcast Advertising](#) (the BCAP Code).

2. 'Unlimited': The Issue

- 2.1. No telecommunications service, texts, calls, broadband or data, can be unlimited in an absolute sense. They are limited by natural constraints, such as the number of people using a service at once, and constraints imposed by providers to structure and manage their networks.

Fair Usage Policies

- 2.2. Providers impose Fair Usage Policies (FUPs) as a tool to manage network resources. They have several purposes, principally:
- **Managing network resources at certain times. For instance, some FUPs involve throttling heavy users' speeds to ease congestion at peak times.**²
 - **Monitoring accounts for illegitimate usage. For instance, business use of a consumer service or the practice of 'sim boxing'.**³
 - **Ensuring that a small minority of extremely excessive users do not affect the integrity of their networks to the detriment of other users.**
- 2.3. In practice, FUPs tend to involve a limit above which usage is considered by the provider to be unreasonable. However, the sanctions employed by different providers for exceeding a limit vary significantly in their actual impact on users. Some providers operate a relaxed approach, merely monitoring breaches or reserving the right to take action. Others, however, engage in practices such as charging for usage in excess of the limits established under an FUP.

The ASA's Present Policy

- 2.4. The ASA allows advertisers to claim that a service is "unlimited" when it is subject to an FUP provided that the existence of the policy is stated in the advertisement and the policy is fair and reasonable, i.e. it must affect only atypical users.⁴ The precedent originated in ASA adjudications on advertisements for fixed line services and was applied subsequently to mobile telephony and data services, as technology developed.
- 2.5. To demonstrate that the FUP affects only the atypical user, advertisers must provide data on the usage profile of their customers for the relevant service. Taking complaints on a case-by-case basis, the ASA has found it acceptable for a telecommunications service to be described as "unlimited" where up to 2% of users transgress the limits set by its FUP. The ASA has not investigated a complaint where the proportion of customers breaching an FUP was greater than 2% and has therefore not found an advertiser in breach of the Codes on the grounds that their FUP was not fair and reasonable.
- 2.6. The ASA's position on "unlimited" claims is, arguably, a pragmatic one. It acknowledges the need for service providers to protect their networks and it recognises that the overwhelming majority of customers will be unaffected by the FUP. As a consequence, the departure from the literal meaning of the claim has until now been tolerated.

Concerns over the ASA's Present Policy

- 2.7. In late 2009, the ASA's position was called into question due to the persistent level of complaints received from consumers about mobile services and the severity of the FUP restrictions imposed. Wider analysis of the ASA's complaint data, however, provides further insight on consumer concerns.

² Providers of data services engage in practices commonly called 'traffic management' or 'traffic shaping'. In general, these involve either the reduction of overall speeds that users receive or the reduction of speed of access to a certain type of traffic, for instance, peer-to-peer downloads. Some providers reduce the speed of access to a certain type of traffic at peak times for all users as a matter of course. This practice is distinct from traffic management undertaken as part of an FUP and does not fall within the scope of the review.

³ 'Sim Boxing' is an illicit practice where sim cards on unlimited tariffs are used in conjunction with an automatic dialling machine to send, for instance, SMS marketing.

⁴ The ASA defines 'atypical users' as excessively heavy users that form a small minority of the customer base of a particular service. This is intended to single out those users whose usage is so significant that it acts to affect the experience of other users.

	Total complaints about “unlimited” claims	Focus of complaints ⁵			
		Fixed broadband services	Fixed telephony services	Mobile data services	Mobile telephony services
2010	90	4	9	70	17
2009	158	38	16	80	30
2008	239	108	13	110	19

- 2.8.** CAP and BCAP acknowledge that the data suggests that consumer concern is in decline. Respondents should note that, although ASA complaint data is indicative of consumer concerns about advertising, it does not take into account wider factors in the market such as changes in the way advertisers use claims. For instance, mobile providers have over the past 12 months begun to move away from the use of the term “unlimited” in a significant proportion of their advertising. This is likely to be one of the factors behind the decline in complaints seen in 2010. It is also notable that the total number of complaints about the telecommunications sector has fallen significantly in recent years.
- 2.9.** CAP and BCAP maintain that the level of complaints is indicative of significant consumer concern. Two themes of consumer concern are apparent from a qualitative analysis of complaint data.
- **Complainants object generally to the use of “unlimited” claims where a service, for some consumers, is limited by an FUP. They believe that there is an inherent contradiction and that the ASA is wrong to follow an approach that tolerates it.**
 - **Many of the complaints focus on the advertising of services where usage restrictions and the prominence given to them are considered particularly unreasonable. Mobile services have already been noted, but another example is the significant number of complaints about fixed line services in 2008 and 2009, which complainants considered to be particularly restrictive due to the proscriptive management of the speeds of heavy users during certain periods of the day.**

⁵ Some complainants objected to more than one service in their complaint. For instance, some consumers objected to claims for “unlimited” mobile data and texts as they appeared in the same ad.

3. Policy Considerations

Setting Expectations

- 3.1. The Review has considered speed claims in the context of advertisements covered by the UK Advertising Codes.⁶ These ads are constrained, to a greater or lesser extent, by time and space; advertising cannot reasonably be expected to provide the same amount of information, for example, as a salesperson or a contract including full terms and conditions, and it plays only one part in the broader sales process. Nevertheless, it is a principle established in law and reflected in the UK Advertising Codes, that advertisements cannot materially mislead, including by the omission of information.
- 3.2. The ASA's interpretation of the Misleading Advertising sections of the Codes is informed by the Consumer Protection from Unfair Trading Regulations 2008 (the CPRs) and The Business Protection from Misleading Marketing Regulations 2008 (BPRs).⁷
- **The CPRs require that advertising must not contain misleading claims, or omit material information, to the extent that the advertisements are likely to adversely affect consumers' transactional decisions about products; the effect on consumers is considered from the point of view of the average consumer.**
 - **The average consumer is assumed to be reasonably well-informed, observant and circumspect. Generally, the average consumer is taken to be the average consumer within the population as a whole. If an advertisement is targeted at a particular group of people, the advertisement is considered from the point of view of the average member of that group.**
 - **The BPRs protect business consumers targeted by business-to-business advertising. The BPRs state that an advertisement is misleading if it deceives the traders to whom it is addressed and is therefore likely to affect their economic behaviour.**
- 3.3. CAP and BCAP consider that it is important to have a consistent approach across different telecommunications services as consumers, whether businesses or otherwise, are unlikely to have significantly differing views on the likely interpretation of the claim. Furthermore, the Codes apply fully to both consumer and business-to-business advertising.
- 3.4. The proposed guidance will recommend an approach that CAP and BCAP consider is likely to be acceptable within this legal framework but it will not proscribe other approaches, nor is it intended to stifle innovation in telecommunications advertising. Because the EU Directive from which the legislation derives is a maximum harmonisation measure, CAP and BCAP cannot apply a greater or lesser restriction on advertising than is provided for in the CPRs. If complaints are received about an advertisement in which a marketer has chosen to depart from the approach ultimately recommended by the Joint Help Note, the ASA will simply expect the marketer to be able to justify why they did so and why the advertisement does not mislead as a result.

Telecommunications Market and Consumer Perspectives

- 3.5. Increased functionality and the availability of new telecommunication devices have led to increased usage of data networks. For instance, mobile data usage has increased 2,000% over 2008 and 2009.⁸ A key driver of this growth is the take up of data intensive smart phones and the roll out of dedicated mobile broadband products, which many consumers use as a substitute for a fixed line broadband service. At the same time, the emphasis on fixed line broadband has shifted to 'superfast' speeds, those in excess of 20Mbit/s, which have enabled greater access to bandwidth-intensive content and facilitated the greater potential for home networks with multiple attached devices.

⁶ Click the links to view the full Codes: The UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing (the [CAP Code](#)) and the UK Code of Broadcast Advertising (the [BCAP Code](#)).

⁷ The Code Annex summarising the CPRs and BPRs can be viewed [here](#)

⁸ Source: Ofcom, The Communications Market 2010, 5 Telecoms and Networks: '[Mobile data use and data revenues](#)'.

- 3.6. As consumers place ever greater emphasis on bandwidth, service providers must cope with greater demands on their network resources. For instance, several respondents to CAP and BCAP's pre-consultation acknowledged the increasing strains on mobile networks. The Review also noted the need for services with shared network resources, like cable and mobile, tend to employ more extensive traffic management under their FUPs. It is notable that complainants have focused on mobile services.
- 3.7. Several respondents to CAP and BCAP's pre-consultation believed that their customers valued the term "unlimited" as a straight-forward way of explaining that a service was suitable for heavy users, avoiding the complexity of detailing usage limits for each element of a service or bundle. One respondent suggested that consumers found "unlimited" useful as it allowed them "freedom from care" over their usage.
- 3.8. Available consumer perception research, however, points to uncertainty over usage limits and FUPs:
- **According to Ofcom, under half of consumers knew exactly what an FUP was, 20% had no idea and 36% said they had a rough idea. 32% of respondents mistakenly believed that they were on an "unlimited" service.⁹**
 - **Which? research found that half of consumers with unlimited usage were unaware of their FUP.¹⁰**
 - **Which? also found that 72% of respondents agreed that "unlimited" services should be unlimited.¹¹**

Background to the Proposals

- 3.9. As bandwidth intensive usage is now more of an issue for both providers and consumers, the acceptability of "unlimited" claims to describe services limited by an FUP is, arguably, more open to question. Complaint data is underscored by available consumer perception research, which suggests that the present ASA position on "unlimited" claims should be reconsidered.
- 3.10. As noted, the ASA's position originally related to fixed-line broadband services, which was adapted subsequently to cover mobile services. Importantly, however, the ASA's original position did not comment on the type of sanctions imposed by fixed-line providers against customers who transgressed their FUPs. That was because early residential services imposed less proscriptive sanctions, for instance, managing the traffic of heavy users at peak times. Harsher FUPs, including some that involve charging for breaches or more proscriptive traffic management, have since been introduced.
- 3.11. Although the 2% level (see paragraph 2.5) established by ASA adjudications is only a small proportion of a customer base, the actual number of users who breach an FUP is potentially very significant. CAP and BCAP also have significant concerns over how FUPs materially affect the behaviour of consumers who do not breach their terms. Are consumers being forced to limit their usage of a service because they fear that they will transgress an FUP? The picture here is not very clear but if the answer to the question is 'yes', then the potential number of consumers who experience detriment from FUPs is perhaps higher than those that breach them and may become higher still as greater demands are placed on usage.
- 3.12. Consumers have also raised a wider question about the ASA's tolerance of departure from the literal meaning of "unlimited". Less proscriptive models of FUP have resulted in few recent complaints. Rather, in recent years, the focus of consumer concern has been on FUPs that utilise temporary suspension of service or more severe models of traffic management. However, CAP and BCAP note also that some respondents to CAP and BCAP's pre-consultation broadly share consumer concerns.
- 3.13. In response to these areas of concern, the Review has identified two alternative approaches that could form the basis of new guidance, variations on which are developed in the proposals below.

⁹ Source: Ofcom [UK Broadband Speeds 2008: Research report](#)

¹⁰ Source: Survey of members of the Which? online consumer panel carried out in June and July 2010.

¹¹ Source: Survey of members of the Which? online consumer panel carried out in June and July 2010.

- **Adopt a more literal approach and move away from the toleration of the literal inconsistency between services advertised as “unlimited” when they are subject to an FUP.**
- **Develop the ASA’s present policy by revising the test of what is an unreasonable FUP.**

3.14. CAP and BCAP acknowledge that the main focus of concern has been on consumer services, in particular mobile data and fixed products with more proscriptive models of traffic management. There have, however, been some complaints to the ASA about business services. In any case, CAP and BCAP consider that it is important to strive for consistency across different types of telecommunications service. Reference to a consumer or the audience in the Advertising Codes is understood to mean anyone who is likely to see a given marketing communication, whether in the course of business or not.

3.15. The Review has found that there is significant variation in what “unlimited” means for consumers of data and telephony services. For instance, different mobile data providers have different FUP thresholds and, in effect, place a different meaning on what constitutes “unlimited” usage. Breaching the FUP of a fixed line broadband service might result in traffic management. However, breaching the same provider’s mobile data FUP might result in a financial penalty. CAP and BCAP consider that, at a time when communications services are increasingly being sold in bundles, there is considerable scope for confusion where references to an FUP in advertisements may refer to two or more policies that are materially different in their effect.

4. Proposed Guidance

Policy Objective

- 4.1. The overriding objective of the Review is to produce guidance that aims to ensure the average consumer is not likely to be misled by advertisements for “unlimited” telecommunications services.
- 4.2. A general objective is that guidance should be written so that it is easily understood and implemented. We welcome comments on the wording of the guidance as well as its intent.

Structure of the Options

- 4.3. In line with CAP and BCAP’s policy considerations, four options are presented for consultation. While there is no preferred option for change to the policy, CAP and BCAP consider it preferable not to maintain the present position because of factors set out in Section 3.
- 4.4. In presenting options for change, this document indicates significant points that CAP and BCAP consider respondents may wish to bear in mind when preparing their submission. The options, which are more fully explained in subsequent paragraphs, are:

Option	Outline
A	Maintaining the ASA’s present policy.
B	Development of the present policy to exclude FUPs that involve additional charges or suspension of service
C	Development of the present policy to exclude FUPs that involve additional charges or suspension of service and customer specific severe traffic management.
D	The exclusion of services that include an FUP that restricts usage in any way

The Proposed Options for Guidance

Option A

- 4.5. This option maintains the present policy, which places two requirements on advertisers:

“Unlimited” usage claims where a service is subject to an FUP are likely to mislead unless:

- i The existence of the FUP is stated in the advertisement and
- ii The FUP is fair and reasonable; it must affect only atypical users.¹²

- 4.6. This option will not result in a change to advertising practice. CAP and BCAP consider, however, that concern among consumers will continue to grow, especially as their expectations of telecommunications services evolve with developments in technology, and that it is therefore advisable to propose a change to present advertising practice.

QUESTION 1: Do respondents agree with CAP and BCAP’s view that guidance should recommend a change to advertising practice? If not, please explain why?

¹² See paragraph 2.4 for details of the ASA’s present policy.

Option B

- 4.7. This option is a development of the ASA's present policy to make "unlimited" claims unacceptable for services that adopt FUPs that involve additional charges or suspension of service.¹³ The present policy (see Option A above) would continue to apply, but it would be subject to a third provision. CAP and BCAP propose the following wording:

"Unlimited" usage claims where a service is subject to an FUP are likely to mislead unless:

- i The existence of the FUP is stated in the advertisement and
- ii The FUP is fair and reasonable; it must affect only atypical users.
- iii Legitimate users incur no additional charge or suspension of service (or similar) as a consequence of exceeding any usage threshold associated with the FUP.

- 4.8. Like the existing policy, this option recognises that providers may seek to protect their service against misuse, but these actions must not materially affect the legitimate user. A legitimate user is taken to be someone who uses the service in accordance with all other terms and conditions of service. Exceeding a particular level of usage does not render a user illegitimate.
- 4.9. A service where an FUP has a threshold over which users are merely monitored for illegitimate use or where speed of access is subject to traffic management at peak times, as with residential broadband services, could still legitimately be advertised as "unlimited" under Option B. These types of FUP do not, arguably, seek to restrict a legitimate user to a particular level of usage.
- 4.10. In terms of impact, the following practices or similar, when included as part of an FUP, would preclude a service being advertised as "unlimited":
- **Charging for usage in excess of a limit, either automatically or reserving the right to do so.**
 - **Capping of usage through whatever means e.g. barring access to the whole service once a limit is reached.**
 - **Termination or suspension of the service.**
 - **Forcing a user to change package to one with a higher cost or stated limitation on usage.**

Respondents should be aware that the exception created by this rule would be difficult to apply to telephony services as texts or call minutes cannot be used more slowly in a manner similar to units of data.

- 4.11. CAP and BCAP consider that there is a material difference between 'how much' and 'how fast' in terms of usage. For instance, most consumers are aware that broadband speeds vary during the day and, even though an FUP may slow a user down at peak times, they are still able to carry out all the activities that they wish. The only noticeable effect would be on download times for large files.
- 4.12. CAP and BCAP, however, recognise that some more severe models of traffic management, under the auspices of an FUP, might restrict certain legitimate users' speeds to the extent that use of their service is materially affected. This is supported by ASA complaint data.

QUESTION 2: Do respondents agree that the proposed option as it is worded is sufficient to meet CAP and BCAP's policy objectives? Please give reasons for your answer.

Option C

- 4.13. This option is an extension of option B that proposes to address the problem with Option B identified in paragraph 4.12.

¹³ Respondents should note that this element of the proposed Option would only apply to data services. Voice telephony does not operate similar policies to traffic management due its nature.

“Unlimited” usage claims where a service is subject to an FUP are likely to mislead unless:

- i The existence of the FUP is stated in the advertisement and
- ii The FUP is fair and reasonable; it must affect only atypical users.
- iii Legitimate users incur no additional charge or suspension of service (or similar) as a consequence of exceeding any usage threshold associated with the FUP.
- iv FUPs may employ traffic management (or similar) as a consequence of exceeding a usage threshold. However, any such policies must not severely restrict the speed of access of the users who exceed the threshold.

- 4.14.** Option C proposes a further requirement to ensure those approaches do not also unreasonably impact on legitimate users. For instance, the ASA might evaluate the impact of requirement (iv) on the basis of evidence of the extent to which an FUP impairs the legitimate user’s usage of a service.

QUESTION 3: Do respondents agree that the proposed option as it is worded is sufficient to meet CAP and BCAP’s policy objectives? Please give reasons for your answer.

Option D

- 4.15.** This option would discourage advertisers from describing services that include an FUP that restricts usage in any way as “unlimited”. CAP and BCAP propose the following wording:

“Unlimited” usage claims are likely to mislead in advertisements for a service that is subject to a fair usage policy that limits the legitimate user’s usage of the service, whether by imposing a limit on the level of usage or the speed at which the service can be used.

- 4.16.** This option treats “unlimited” claims in a literal sense and represents a departure entirely from the ASA’s existing position, which is based on the acceptance that some types of restriction operated under FUPs are acceptable provided that they are fair and reasonable. In line with the general consumer concern and the view of some pre-consultation respondents, CAP and BCAP consider that the consultation should consider a more sweeping approach to the problem.
- 4.17.** The principal impact would be to stop providers that indirectly limit usage through regulating speeds of access, for instance, to manage congestion at peak times, from using the term “unlimited” to describe those services. It does not, however, completely preclude advertisers from using the claim, for instance, advertisers may still refer to specific elements of a data service that are not subject to FUPs.¹⁴

QUESTION 4: Do respondents agree that the proposed option as it is worded is sufficient to meet CAP and BCAP’s policy objectives? Please give reasons for your answer.

QUESTION 5: Do you have other comments or observations on CAP and BCAP’s Review that you would like taken into consideration as part of their evaluation of responses?

¹⁴ CAP and BCAP note some providers are presently offering “unlimited web browsing”, which is not subject to an FUP because the element of the service does not include more bandwidth intensive protocols such as streaming or downloading.

5. Next Steps

- 5.1.** CAP and BCAP invite interested parties to comment on its proposals. Given the technical nature of this consultation, CAP and BCAP would particularly welcome responses from industry parties and bodies representing consumer interests in the telecommunications market. Nevertheless, responses from other stakeholders are welcome. Information on how to respond to this consultation can be found in Annex 1.
- 5.2.** The following summarises the consultation, evaluation and approval process for the finalised guidance.
- **The consultation will close at 5pm on Friday 25 February 2011.**
 - **CAP and BCAP will evaluate all significant responses and finalise a proposal for guidance.**
 - **The evaluation of responses will be published on the CAP website and will explain the reasoning behind CAP and BCAPs decisions.**
 - **The approved guidance will then be presented to the ASA Council who will be asked to have regard to it when considering complaints about “unlimited” claims under the Misleading Advertising sections of the Codes.**
 - **CAP and BCAP will publish the guidance on the CAP website. The guidance will apply immediately to campaigns developed after the publication of the guidance. A grace period of six months will apply to existing campaigns.**

Annex 1: Responding to this consultation

How to respond

CAP and BCAP invite written comments including supporting evidence on the proposals contained in this document, by **5pm on Friday 25 February 2011**.

When responding, please state if you are doing so as an individual or a representative of an organisation. Also, please make clear what your individual interest is or who your organisation represents. It will be helpful if you explain fully and clearly why you hold your opinion.

We strongly prefer to receive responses as e-mail attachments, in Microsoft Word format, because that helps us to process the responses.

Please send your response to andrewt@cap.org.uk.

If you are unable to reply by e-mail, you may submit your response by post or fax (+44 (0)20 7404 3404), marked with the title of the consultation, to:

Unlimited Claims Consultation
Code Policy Team
Committee of Advertising Practice
Mid City Place
71 High Holborn
London WC1V 6QT

Accessibility

We want our consultation process to be accessible to everyone. If you have particular accessibility needs please contact the Code Policy team and we shall be happy to help.

Telephone: 020 7492 2200
E-mail: andrewt@cap.org.uk
Fax: 020 7404 3404
Textphone: 020 7242 8159

Note that we do not need a hard copy in addition to an electronic version. Also note that, other than an automated response to responses received by email, CAP and BCAP will not routinely acknowledge receipt of responses.

CAP and BCAP have sent written notification of this consultation to the organisations and individuals listed in this annex. We welcome suggestions of others you think should be informed of this consultation.

More information

If you have any questions about this consultation or need advice on the form of response, please contact CAP's Code Policy team on +44 (0)20 7492 2200 or email us at codepolicy@cap.org.uk.

Confidentiality

CAP and BCAP consider that everyone who is interested in the consultation should see the consultation responses. We shall publish all non-confidential responses on our website, www.cap.org.uk, when we announce the outcome of the consultation.

All comments will be treated as non-confidential unless you state that all or a specified part of your response is confidential and should not be disclosed. If you reply by e-mail or fax, unless you include a specific statement to the contrary in your response, the presumption of non-confidentiality will override any confidentiality disclaimer generated by your organisation's IT system or included as a general statement on your fax cover sheet.

If part of a response is confidential, please put that in a separate annex so that non-confidential parts

may be published with your identity. Confidential responses will be included in any statistical summary of numbers of comments received.

List of consultees invited to respond

To obtain a variety of opinions, CAP and BCAP have invited these individuals and organisations to respond to this consultation:

BE Un Ltd
British Sky Broadcasting Ltd
British Telecommunications plc
Citizens Advice Bureau
Communications Consumer Panel
Consumer Focus
Department for Culture Media and Sport
DSG Retail Ltd
Epitiro Ltd
Hutchison 3G UK Ltd
Internet Service Providers Association
KComm Group
Ofcom
Orange PCS Ltd
Mobile Broadband Group
Mobile Marketing Association
Phones 4u Ltd
Sam Knows Ltd
TalkTalk Telecom Group PLC
Telefónica O2 UK Ltd
Tesco plc
T-Mobile (UK) Ltd
Virgin Media Ltd
Vodafone UK Ltd
Vonage Marketing LLC
Which?

Please note that CAP and BCAP welcome responses from all other interested parties.

According to need, we will endeavour to provide copies of this document in alternative formats upon request.

Please contact us at:

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The Committee of Advertising Practice (CAP) is the industry body responsible for writing and enforcing the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing to ensure that all non-broadcast advertisements are legal, decent, honest and truthful.

The Broadcast Committee of Advertising Practice (BCAP) is the industry body responsible for writing and enforcing the rules for TV and radio advertising, collected in the BCAP Code, to ensure that all broadcast advertisements are legal, decent, honest and truthful.

To find out more about the work of the Committees or to subscribe to our quarterly advertising industry e-mail newsletter, visit our website at: www.cap.org.uk.