

Competition and Consumer Policy Section
Department of Jobs, Enterprise and Innovation
Earlsfort Centre,
Lower Hatch Street
Dublin 2

20^h June 2013

Re: Consultation on Consumer Rights Directive 2011/83/EU

Dear Sir/Madam,

I am responding on behalf of the Irish Banking Federation to your recent consultation on Directive 2011/83/EU.

Financial Services are exempted from the scope of Directive 2011/83/EU as outlined above. However, as the Minister is considering the extension of the scope of the Directive to the Financial Services sector in relation to question 12 of the consultation I set out below the industry response on this matter.

Consumers currently use a variety of telecommunication services to contact telephone helplines of Financial Service providers including landline, mobile and internet. Consumers also have the choice to use a 'pay per use' or packaged option from their telecommunications provider. In relation to Financial Services in Ireland, customer helpline numbers are provided at or below the basic rate and include standard local charges along with Call Save (1850), LoCall (1890) or Freefone (1800) numbers or their equivalent.

We believe that all Premium rate services, as regulated by the Commission for Communications Regulation (ComReg) should be excluded for the purposes of customer helplines in the Financial Services industry as is the current practice. We also note that the Code of Practice for Premium Rate Services requires that suppliers provide clear and transparent information on the usage of any Premium Rate number. This information would enable the consumer to identify where such numbers were used to provide a helpline.

Please contact the undersigned if you would like to discuss this response in further detail.

Yours faithfully,



Maurice Crowley
Director: Retail