



**Consumer
Focus**
Campaigning for a fair deal

Consumer Focus response to the OFT consultation on e- consumer protection strategy

October 2010

Introduction and recommendations

We welcome the OFT consultation on e-consumer protection strategy and support its overall goal to improve effectiveness of online markets and enhance consumers' trust in the latter.

We believe that a robust e-consumer protection strategy is required to respond to the growing take up in e-shopping among UK consumers and a rapid expansion of the online market. Online shopping can benefit consumers with increased competition and lower prices, more product choice and services and the ability to shop at anytime from vendors located anywhere in the UK or around the world. However the immediacy of transactions, the remoteness and anonymity of buyer and seller can pose challenges to online consumer protection. We believe that effective strategy to tackle unfair online trading is required in this difficult economic time when consumers' need to search for bargains and low prices increases, but may be exploited by rogue traders.

We recommend the OFT strategy tackles the key challenges and consumer concerns in order to increase consumers' confidence and trust online and to sustain innovative and competitive e-commerce growth.

We recommend the OFT e-consumer protection strategy should:

- Address the level of enforcement gaps with regard to online information disclosure, advertising, payment, data protection and privacy, deliveries and new online platforms such as consumer to consumer (C2C) transactions (eg online auctions and marketplaces) and mobile commerce
- Improve transparency and quality of consumer information on traders' websites. In particular an introduction of summary box information, based on the model developed in financial services market, should be considered so that consumers can get access to essential information about the product, trader's contact details, and rights specific to distance selling regulations within easy reach
- Enhance enforcement and compliance through (1) strengthening and supporting Trading Standards Services (TSS) at local level to ensure delivery of equally high standards of service to all consumers across the UK, (2) improving co-operation and intelligence sharing between stakeholders, (3) strengthening monitoring and surveillance mechanisms and (4) mapping business barriers to compliance

In addition we recommend the OFT works jointly with the Department for Business, Innovation and Skills (BIS) to address the regulatory gaps in relation to digital products (eg eBook readers, computer software and online music) and new trading platforms such as C2C transactions and mobile commerce.

Addressing consumers' online concerns

Online consumer information and advertising practices

Online shopping is characterised by remoteness of the buyer and seller so the ability to access accurate information about the product and the retailer forms an essential part of the transaction. Yet many consumers are not adequately informed about products they are buying, the identity of the business they are dealing with, or their rights and obligations specific to online sales, for example, the right to a cooling off period, the right to contract cancellation if the product is not delivered within 30 days after placing the order. The EU web sweep of online retailers selling consumer electronic goods carried out in 2009, which included UK online retailers, found that many websites did not provide complete information about the products, prices and their own businesses.¹

Consumers also struggle to identify who to contact in case of a problem. For example Ipsos MORI's research commissioned by Consumer Focus Scotland on the public's experience and perceptions of trading services in Scotland found a high number of consumers who did not know who to contact if they had a complaint about goods bought over the internet.²

Consumers' confusion over who to contact in case of problems is likely to increase in complex transactions involving different actors such as online auctions³ and marketplaces, payment intermediaries, advertisers, search engines where traders may not disclose clear information about their roles and responsibilities towards a consumer. For example our cross-country research of consumer experiences of buying goods and services over mobile phones indicated gaps in information disclosure about lines of responsibilities of traders in transaction chains.⁴

Access to reliable information also depends on fair and transparent online advertising and marketing practices. The latter is increasing in importance not only for online commerce but also offline shopping, as many consumers who do not intend to purchase online use the internet for product search and price checks. For example 58 per cent of online advertising in the UK is done on search engines and search comparison sites.⁵ Yet there is limited transparency of information available to consumers about these types of advertising practices and consumers using the search engines are unaware that a

¹ <http://bit.ly/9Ck1X3>; <http://bit.ly/bluZwX>; see also the European Commission report on cross-border e-commerce, 22 October 2009 <http://bit.ly/aKcXJG>

² *Cause for complaint? How consumers deal with problems with goods and services in Scotland*, June 2010. <http://consumerfocus.org.uk/g/4mh>

³ For example in order to buy on an auction website the consumer will have first to conclude a contract with the auction site itself (a service contract - to have access to the technical infrastructure that allows him to purchase products) and second, another contract (a sales contract) with the seller. In Riefa, Christine, *To Be or Not to Be an Auctioneer? Some Thoughts on the Legal Nature of Online 'eBay' Auctions and the Protection of Consumers*, *Journal of Consumer Policy* (2008) 31:167-194.

⁴ Consumer Focus Survey *Pocket shopping – International consumer experiences of buying goods and services on their mobile phones* Marzena Kisielowska-Lipman December 2009 available at: <http://consumerfocus.org.uk/g/4m0>

⁵ Internet Shopping. An OFT Study, 2007.

prominent position of a vendor may not equate with the best quality offer or best match of a product searched.

In addition new types of advertising techniques such as targeted and behavioural advertising raise concerns about the transparency of advertising practices and how best to protect consumers' privacy and being the target of unsolicited advertising. An additional issue arises in relation to available enforcement and remedy mechanisms to protect children, who are particularly susceptible to online advertising. Our research *A Tangled Web: Marketing to Children*⁶ examined current regulation on online advertising to children and found that children are not adequately protected by either the law or industry self-regulation. This is despite the recent extension of the digital remit of the non-broadcast advertising code by the Committee of Advertising Practice (CAP code) and changes made to improve advertising on brands own websites. The CAP code still does not cover sponsorships, competitions and marketing communications from foreign media.

We recommend the OFT takes steps to improve enforcement of consumers' protection right to information and protection against misleading advertising practices. We believe that improving online information disclosure would benefit both consumers and traders, enhance consumers' online trust and contribute to the development of sustainable online market. In decreasing information asymmetry we recommend the OFT studies the summary box model that has been introduced by the Financial Services Authority in delivering greater transparency in information on financial services to consumers.⁷ We recommend the OFT examines the applicability of this model to online sales.

We recommend the OFT allocates resources both to ensure online traders abide by the statutory information requirements, and that the quality of information is improved. In particular we would encourage the OFT to help with advice to small online businesses which may lack knowledge and resources on how to meet their statutory obligations.

Online payment

Currently consumers paying online encounter problems with limited choice of payment methods, payment surcharges and variation in payment protection.

As far as choice of payment is concerned retailers have the ability to limit payment options. The limited choice of payment may pose a significant barrier to vulnerable consumers. For example currently many consumers who fall into low income household category may have limited access to payment cards (the most popular payment method offered by online retailers in the UK) because many of these households do not have bank accounts.⁸ Therefore if the OFT e-strategy seriously considers enhancing participation in online commerce, consumers from vulnerable social strata the issue of widening choice of payment methods needs to be taken into account.

Payment choice may also be limited by additional surcharges that are applied to specific means of payment. In some cases, for example purchasing air tickets online, surcharge may apply to each ticket rather than the total cost of the transaction that adds incremental costs to the purchase value for family members for example. We recommend the OFT investigates the issue of surcharges especially in the airline industry.

The second issue that raises concerns is variation in payment protection. New payment methods are increasingly evolving, such as PayPal and mobile payments. Mobile payment is growing with the increased take up of smart mobile phones among

⁶ *A Tangled Web: Marketing to Children*, Consumer Focus October 2010.

⁷ <http://www.consumerfocus.org.uk/files/2010/10/A-tangled-web-for-web.pdf>

⁷ <http://bit.ly/9UGTpN>

⁸ <http://consumerfocus.org.uk/g/4mi>

consumers, though our research found it raises concerns in the area of mobile security, payment process, dispute charges and protection of minors.⁹

While innovation and flexibility of payment methods is generally a good thing for consumers, the fact that dispute rights, as well as guarantees and assurances provided by financial institutions vary is not. We would like to note that so far regulation and regulators have been slow to catch up with new payment methods and providers that are not traditional financial institutions. For example the OFT covers licensing of credit providers and the Financial Services Authority (FSA) covers licensing of deposit taking institutions, however payment providers may not necessarily fall into either of these categories and so are not eligible for licences and not subject to the supervision of these regulatory authorities. The UK Payments Council is a membership body established to ensure that UK payment systems and services meet the needs of users, payment service providers and the wider economy. However it restricts membership to financial institutions. More pro-active work in supporting innovation and enforcing adoption and a more inclusive membership structure to enable entry to payment providers that are not financial institutions is needed to remove barriers to innovation and market entry and to enable standards to be set across all payment providers.

Currently the OECD Committee for Consumer Policy carries out work on online payment protection that forms part of its review of the OECD Guidelines on Consumer Protection in the context of e-commerce. We recommend the OFT takes account of the OECD work and investigates the level of consumer protection in online payment, as well as examines the option to extend the chargeback mechanisms to all device initiated forms of payments online.

Digital products

Consumers' rights and obligations in relation to the online purchase and servicing of digital products are not clearly established. For example consumers buying digital products online lack redress and remedies for faulty or damaged digital goods and services. Digital products delivered in the process of downloading or streaming are classified as 'intangible goods' and as such are exempt from the statutory consumer's right to redress.¹⁰ As a result consumers buying digital goods and services are exposed to risks in case products are not fit for purpose or undelivered, and need to rely on a good will of retailers and content providers when seeking remedies.

More complexity is added by the copyright attached to many digital products that restrict terms of use. Consumers buying copyrighted digital content do not acquire the ownership of the product but only the right to use it under terms of the end user licence agreement (EULA). The study by our predecessor organisation the National Consumer Council *Whose licence is it anyway?* found that many of the contract terms contained unfair clauses and called upon OFT to undertake market study on the fairness of terms in licence agreements.¹¹ Our recent mystery shopping survey of buying digital products online also found some contracts containing clauses that question the level of restrictions

⁹ Consumer Focus Survey "Pocket shopping - International consumer experiences of buying goods and services on their mobile phones" Marzena Kisielowska-Lipman December 2009 available at: <http://consumerfocus.org.uk/g/4m0>

¹⁰ The gaps in consumer protection for digital products has been acknowledged in a report "Consumer Rights in Digital Products". A research report prepared for the UK Department for Business, Innovation and Skills, by Professor Robert Bradgate, September 2010. <http://bit.ly/aTYlqn>

¹¹ *Whose licence is it anyway?* A study of end user licence agreements for computer software, Carl Belgrove, National Consumer Council 2008.

imposed on software requirements, time limits or limitation of liability in case of product non-conformity.¹²

Also the quality of information provided to consumers when buying digital products raises additional concerns. We would like to note that obtaining accurate information is especially acute to digital products because the latter come with many restrictions that may impact on their usability. For example many digital products require specific software or equipment that may determine their playability, or are protected by intellectual property rights licences that determine terms of use. However our study, mentioned above, found examples of low quality consumer information demonstrated by lengthy contracts, complex wording and widespread use of legal jargon. For example having read terms and conditions many mystery shoppers did not understand their rights and responsibilities when buying digital products.¹³

We recommend the OFT works jointly with BIS to address the regulatory gaps in relation to digital products. In particular we recommend the OFT and BIS consider an introduction of a pre-contractual information requirements for digital products to provide consumers with the knowledge on how to use digital content, including technical protection measures and the interoperability of digital products with hardware and software.

C2C transactions

The emerging business models that fall within the category of C2C transactions such as online auctions or marketplaces also raise issues over adequate consumer protection. Most common complaints related to C2C transactions refer to goods not delivered to buyers, payment not delivered to sellers, delivery of goods of a lesser value or very different from the advertised description, late delivery of goods, and failure to give relevant information about a product or terms of sale.

In addition consumers may fall victims of fraudsters and persistent offenders using C2C platforms to disguise themselves, selling unlicensed medicine, illegal or hazardous products. For example in 2009 Which? online search on eBay found DIY botox and tan jab kits available on sale that raised questions about safety.¹⁴

Yet consumers face problems with redress because the auctions do not accept liability for sellers' or buyers' losses, or for the quality, safety, or legality of the products on sale, nor are responsible for the verification of the identity of the users.

Consumers are often not aware whether they are dealing with an individual subject to C2C regulations, or a seller selling 'in the course of business' who is subject to B2C regulations such as the right to cancellation and warranties, in cases of businesses using online auctions for trading 'fixed priced' products. For example the OFT study of Internet Shopping reported that the required information about business sellers in case of online auctions is not always available to consumers.¹⁵

We recommend the OFT examines the scope for expanding the consumer protection rules to C2C transactions and develops a clear set of rules for consumers who engage in selling products online on a one-off basis as opposed to on a regular basis. In addition we recommend the OFT ensures that providers of online marketplaces improve information to consumers about their rights and responsibilities, as well as put in place effective

¹² The research was carried out between March and April this year and aimed to test real-life experience of people purchasing digital content and services. In total we placed 194 orders that included (1) computer software, (2) downloads (music, movies and e-books) and (3) streaming (music and movies). We are due to release a research report in autumn.

¹³ Ibid

¹⁴ <http://bit.ly/cyNjDu>

¹⁵ Internet Shopping. An OFT Study, 2007.

mechanisms to help consumers evaluate risks and assist in complaint resolution. Some online platforms facilitators already put some ODR systems in place which we will discuss in the paragraph below, but they need to be further improved.

Privacy and data protection

Buying online comes at the price of privacy as often consumers' data is collected by different parties, for example by ISPs, traders, web browsers, publishers, affiliation companies, social networks platforms, ad-serving agencies and others, and the vast majority of consumers are not aware of this situation. New technologies facilitate collection, storage and trading of personal information online to supply the new online marketing model of profiling and behavioural advertising.

Consumers concerns over the integrity of personal information collected online and the potential for abuse are reinforced by incidents of online fraud and the growing requirements for consumers to provide personal information that has significant value not only to advertisers, but for fraudsters as well.

At the same time the existing regulatory framework for data protection is weak.

For example the UK's Data Protection Act (DPA) does not implement European law properly, in relation to the articles about the powers of the Information Commissioner's Office, definitions of personal data, conditions when sensitive data can be processed, fair processing notices given to individuals, rights granted to data subjects, and ability of individuals to seek a remedy.¹⁶ In addition despite the existence of the EU Directive on Privacy and Electronic Communications that requires member states to ensure the confidentiality of their communications and related traffic data, and prohibits interception and surveillance of users unless the users concerned have given their consent, communications of UK consumers have been intercepted by the online advertising technology Phorm without consent.¹⁷

There is no mechanism for the right to access one's personal information. There is little that consumers can actually do if their data is disclosed deliberately, hacked into or lost through negligence.

We recommend the OFT establishes close co-operation with the Information Commissioner's Office to tackle the issue of online privacy protection, to include an impact assessment of regulatory and enforcement gaps.

Deliveries

We recommend that the OFT addresses the issue of deliveries that remain a common problem generated by online sales. These include non delivery, late delivery, damaged goods, and lack of clear disclosure on delivery terms and conditions including delivery charges. For example some companies do not display the cost of additional delivery charges during the check out stage. Others hide delivery charges in small print. Delivery problems are particularly acute in rural areas, where retailers and delivery operators might apply additional restrictions. For example research carried out by Consumer Focus Scotland found that restrictions placed on deliveries in rural areas can include: (1) higher delivery charges, (2) longer delivery times (3) deliveries not being available to certain rural areas.¹⁸ Others display additional delivery charges in small print or fail to deliver to

¹⁶ <http://consumerfocus.org.uk/g/4mj>

¹⁷ <http://bbc.in/9trpwk>

¹⁸ Parcel Deliveries: Current Practice and Possible Solutions - A briefing from Consumer Focus Scotland, July 2010. <http://consumerfocus.org.uk/g/4mj>

targets indicated in terms and conditions. Furthermore, if the product is damaged during the delivery it is often not clear for consumers where to complain.

Complaints and redress

We support the OFT strategy goal to increase effectiveness of consumer redress. A major inhibiting factor to buying online is the fear of not being able to obtain redress or compensation in the event of a problem. The low consumers' confidence over online redress is even more apparent in the context of cross-border purchases indicated by the recent European Commission report on cross-border e-commerce that found 71 per cent of consumers believing it is harder to resolve problems such as complaints, returns, price reductions, or guarantees when purchasing from providers located in other EU countries¹⁹.

We agree with the OFT proposal of encouraging the possibility of collective redress that could be used as a particularly useful instrument to ensure effective access to justice to a large number of consumers affected by the same problem.

With regard to the proposal to increase the use and effectiveness of Alternative Dispute Resolution systems (ADRs) by both consumers and businesses, we recommend the OFT carries out in depth work to evaluate their applicability and mechanisms. We recommend exploring the ADR schemes present in the telecommunication and financial sectors.

We note that at present some retailers offer consumers access to Online Dispute Resolutions (ODR). Although the use of ODRs may be more effective than traditional dispute methods in terms of time, convenience and financial resources involved, it has also drawbacks. These include lack of direct interpersonal contact that may limit consumers' ability to convey their arguments and acceptable solution to a dispute. In addition ODRs may require a certain degree of knowledge and familiarity with sophisticated web technology that may be an obstacle to some consumers. Also it is not certain whether the ODRs currently available to consumers comply with the principles embodied in the existing EC Recommendations²⁰ for Alternative Dispute Resolution especially regarding the independence of a third party, the impartiality of the procedure and the compliance with the fundamental right to due process.

We recommend the OFT examines compliance of the ODR schemes offered on the market with the above recommendations.

We also recommend the OFT strategy improves the quality of complaint handling mechanisms. Research into consumer experiences of online shopping indicate that access to customer services and effective complaint handling are the key areas that generate problems.²¹ For example consumers find it difficult to get access to information about who to contact in case of problems. Some traders do not provide information on customer services and complaint handling. Many retailers provide an email address as the major point of contact, however without any targets for responding to communication attached. We recommend that the OFT strategy should tackle the problem of poor complaint handling.

¹⁹ EC Staff Working Document report on cross-border e-commerce, SEC(2009) 283 final.

²⁰ Recommendation of 30 March 1998 on the principles applicable to the bodies responsible for out-of-court settlement of consumer disputes (98/257/EC) and Commission Recommendation of 4 April 2001 on the principles for out-of-court bodies involved in the consensual resolution of consumer disputes (2001/310/EC).

²¹ Cause for complaint? How consumers deal with problems with goods and services in Scotland, June 2010; Consumer Focus Survey "Pocket shopping - International consumer experiences of buying goods and services on their mobile phones" Marzena Kisielowska-Lipman December 2009 available at: <http://consumerfocus.org.uk/g/4m0>

Mobile commerce

The increasing take up of smart mobile phones among consumers drives the development of a new business model that enables consumers to purchase goods and services over mobile phones. The most popular list of products traded over mobiles includes ring tones, screen savers, games, traffic reports and news, but services such as mobile banking services, payment transactions, downloading music, watching TV and videos, social networking and location tracking are increasing in demand too. However there are concerns that consumer protection for mobile phone users is less robust than for computer users, while the potential for fraud and abuse is greater. For example the OECD Policy Guidance for addressing Emerging Consumer Protection and Empowerment Issues in Mobile Commerce identified concerns over limited information disclosure, payment security, unauthorised purchases, privacy, child protection, and malware (spam and viruses).²² The recent Consumer Focus mystery shopping survey conducted with the use of a mobile phone with consumer organisations from 11 countries found restrictive market choice, inadequate information disclosure, poor complaint handling and redress, problems with payments, insufficient advice on mobile security and poor protection of under-aged from over-consumption.²³ The OECD Committee for Consumer Policy has been carrying out work on identifying consumer protection gaps in online payment, including mobile payment and we recommend OFT takes account of this work in its strategy.

²² OECD Policy Guidance for Addressing Emerging Consumer Protection and Empowerment Issues in Mobile Commerce, Korea 2008.

²³ Pocket shopping. International consumer experiences of buying goods and services on their mobile by Marzena Kisielowska-Lipman, Consumer Focus, December 2009.

Enhancing enforcement and compliance

We support overall the OFT proposals to improve enforcement of consumer protection regulations online. In particular we recommend the OFT strategy takes account of the following actions points: (1) develops enforcement capability, (2) enhances co-operation and intelligence sharing between stakeholders, (3) improves monitoring and surveillance mechanisms, (4) maps business barriers to compliance.

Developing enforcement capability will require strengthening and supporting Trading Standards Services (TSS) at local level to ensure delivery of equally high standards of services to all consumers across the UK. For example Consumer Focus Scotland's review of TSS in Scotland found a lack of consistency in the services offered to both consumers and businesses across Scotland.²⁴ The report discovered that there was no effective national system in place to measure the effectiveness of the service and that resources to support TSS varied.²⁵ In order to drive up standards and consistency of TSS we recommend an introduction of performance indicators to measure the effectiveness of TSS across the UK in delivering the outcomes, and identify resource and training needs.

The complexity of online shopping that involves multiple parties such as online retailers, ISPs, payment intermediaries, search engines and advertisers requires close co-operation between the stakeholders involved. Many of the regulatory issues arising are cross-cutting and can only be addressed and resolved in the course of joined up actions between relevant regulators. For example the ICO has the enforcing power to deal with unsolicited direct marketing²⁶, however lacks technical capabilities to counteract spam that is often the means of delivery of marketed fraud or malicious software.

The OFT also needs to consider the most effective ways of enhancing information sharing between the industry, consumer groups and other relevant stakeholders. We strongly support the OFT proposal of a UK e-consumer protection enforcement group that would close enforcement gaps, facilitate information sharing and intelligence gathering and enable a proactive approach to problem solving.

An effective enforcement strategy relies upon adequate monitoring and surveillance mechanisms that could enable timely and accurate intervention or even more desirable prevention. In the first instance we recommend addressing the issue of updating the Consumer Direct database with adequate categories that would reflect better complaints specific to online shopping. This would translate into reductions of time and costs of impact assessments.

Secondly, the Consumer Direct complaint handling model has a reactive character and in most cases takes effect once a consumer suffers detriment. It means it is unlikely to prevent unfair practice or fraudulent activity. We recommend that Consumer Direct develops capacity to register consumer queries and concerns, monitoring of which may result in preventative actions. For example recorded cases of consumers calling to report concerns about spam or suspicious websites could be referred to investigations.

²⁴ Up to Standard? A review of trading standards services in Scotland, June 2010.

<http://consumerfocus.org.uk/q/4ml>

²⁵ Ibid

²⁶ The Privacy and Electronic Communications Regulations 2003.

In addition we also recommend the OFT works closely with businesses to drive compliance. In particular we recommend addressing information and training needs of small businesses that are increasing online presence due to lower start up costs, but which may lack knowledge, resources or skills on how to comply with regulations specific to e-commerce.

Consumer education

We agree with the OFT analysis that consumer awareness of their online rights is low and therefore more efforts should be made to improve this. However we are concerned that building the strategy around informing consumers about their rights to cooling off period or redress may not be a sufficient remedy to the problem. We would like to point out that the online environment is complex and many things happen behind the scenes without consumers' knowledge, explicit consent or understanding. New tools to help consumers protect themselves are introduced on the assumption that all consumers are internet savvy, have the skills and the time required to actively engage. For example third party cookies that are used as a vehicle in online advertising are set on the 'opt in' model. This is despite the fact that many consumers do not have sufficient understanding of cookies or the knowledge on how to change the setting to enable the 'opt out' function.²⁷

Similarly informing consumers about safety risks may pose a challenge because consumers will require sophisticated knowledge to assess safety and security risks. For example in cases of online payment consumers need to know how to verify that a connection through a safe Internet Protocol is established before any payment takes place, how to use and update anti-malware programmes, as well as the importance of changing passwords frequently.

Therefore although education and awareness campaigns can help consumers in protecting themselves they should not be relied upon as the key pillar of the strategy, and the responsibility for enhancing consumer protection should not lay entirely on consumers' shoulders.

We believe that addressing consumers concerns listed in section one would be the most effective way of enhancing consumer protection online. In particular improving the quality of information provided to consumers by traders would go some way in alleviating consumer information gaps.

We agree with the OFT proposal of closer partnership between government agencies and consumer groups in making the maximum impact on empowering consumers through education. However if consumer education is to be taken seriously sufficient resources need to be allocated to achieve this goal.

We recommend the OFT strategy addresses particular education needs of different consumer groups, for example low income households, children and old age groups. In order to design the most effective solutions especially for low income households that live on the edge of digital exclusion, but who nonetheless would benefit from online participation we recommend the OFT establishes co-operation with the Digital Inclusion Champion.

²⁷ For example our online survey of people's awareness of computer cookies carried out in February this year found that 47 per cent of respondents were unsure, did not know or never heard of cookies.

And finally we recommend the OFT encourages the private sector that generates profits from e-commerce to take the lead in consumer education. We would like to refer the OFT to the OECD Guidelines for Consumer Protection in E-Commerce that recommends not only governments and consumer stakeholders, but also businesses foster awareness of the consumer protection framework.²⁸ We recommend exploring examples from the financial sector, for example safety awareness raising campaigns used in promotion of online banking.

²⁸ Guidelines for Consumer Protection in the Context of Electronic Commerce, OECD 2000, p.19.



Consumer Focus response to the OFT consultation on e-consumer protection strategy

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