

**Making switching easier and more reliable for consumers: Proposals to reform landline, broadband and pay TV switching between different platforms – Consultation response**

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MoneySuperMarket
<b>Disclaimer</b>
<b>Question 1: Do you agree that current cross-platform switching arrangements lead to consumer issues with loss of service and double paying when switching, and issues with contacting losing provider / cancelling a previous service?</b>
Yes.
<b>Question 2: Do you agree that current cross-platform switching arrangements lead to consumer issues with loss of service and double paying when switching, and issues with contacting losing provider / cancelling a previous service?</b>
Yes. A consistent approach across Openreach, Sky satellite, Virgin and KCOM and across dual play, triple play and stand-alone TV, would help reduce the current confusion around the switching process and the deterrent this creates for consumers to switch. Customers should have one consistent approach and notice period for all their home communications services.
<b>Question 3: Do you have any other comments on the matters raised in Section 3?</b>
No. MoneySuperMarket believes that Section 3 captures the main challenges consumers face when trying to switch supplier. We believe that removing the need for a customer to contact their old provider will have an additional consumer benefit: namely that it will increase competition and pricing. If it continues to be mandatory to contact your old provider to coordinate a switch, it is likely to result in anti-competitive behaviour where an existing provider can selectively price “win back” offers based on the data they hold on customers. This removes the consumer benefit of being rewarded and offered retention deals.
<b>Question 4: We would welcome views on the proposal for an EC&amp;R process (Option 1), in particular:(a) whether is it effective in reducing the consumer difficulties and deterrents identified through our analysis (b) whether you agree co-ordination by the new provider should be opt-in for the consumer and (c) if the information on implications of switching provided at the cancellation stage is likely to be as effective as receiving it in durable form during the transfer period?</b>
A- We agree with Ofcom that EC&R would help reduce many of the difficulties faced by consumers but GPL which will deliver much better outcomes for consumers for three reasons: (1)The interactions with the losing provider are limited in EC&R, but it does not remove the need for interaction completely - unlike the GPL model (2)Aligning bundled services to GPL in the same way as fixed line and broadband would reduce the confusion for customers about how to switch

and make the industry easier to explain (3)A weakness exists in the EC&R process where the customer has a 2 working day window to cancel with their losing provider. Often this involves significant hassle for consumers, including long waiting times.

B- No. Making the co-ordination non mandatory for providers can have a detrimental impact on the remedy. The new switching process should seek to have the gaining provider lead the switch.

C-There is less room for error in the GPL process because the customer receives confirmation.

**Question 5: We would welcome views on the proposal for the GPL process (Option 2), in particular: (a) whether is it effective in reducing the consumer difficulties and deterrents identified through our analysis and (b) if the ten working day transfer period is a sufficient length of time for a consumer to receive, understand, and act upon implications of switching information that is sent to them by the old provider?**

(A) Yes, MoneySuperMarket believes that the adoption of a GPL process would be effective in reducing the consumer difficulties and deterrents identified by Ofcom. It would also bring broadband, landline, and pay TV switching in line with moves to implement GPL in the mobile industry.

(B) Yes, we believe this gives sufficient time for the required steps (reducing concerns around slamming, understanding the implications of switching, co-ordinating a transfer date and receiving hardware). The 10 day transfer period is the same as the fixed line and broadband GPL timelines which appears to have worked effectively so far.

**Question 6: On both process options, we would welcome views on whether old providers are provided with sufficient time during the respective transfer periods to: (a) stop existing services and administer the end of contracts and (b) if not, can you provide detail of what actions/steps are necessary to undertake such activities, and how long these would take?**

N/A

**Question 7: Do you agree that the proposals should apply to all cross-platform services, whether provided in a bundle or on a standalone basis?**

Yes, we would strongly recommend that GPL is introduced across all cross platform services.

**Question 8: For both process options, we welcome any views on the estimated 18-month implementation period.**

N/A

**Question 9: Do you have any other comments on the matters raised in Section 4?**

N/A

**Question 10: Do you agree with the assessment of the consumer benefits of the proposals?**

Yes, MoneySuperMarket agrees with the assessment of the consumer benefits of the proposals and strongly supports Ofcom's decision to proceed with GPL.

**Question 11: Do you agree with the assessment of the likely costs of the proposals as set out in the Cartesian report? If not, please state how and provide information and evidence relating to the costs.**

N/A

**Question 12: Do you think that a manual communication channel for small providers would be more appropriate compared to an automated communication channel? What costs would be involved in setting up a manual communication system?**

N/A

**Question 13: Do you agree with our preference for Option 2 (GPL)?**

Yes. MoneySuperMarket strongly agrees with Ofcom's preference for option 2, believing that it will result in greatly improved outcomes for consumers, including better levels of shopping around and competition.

**Question 14: Could there be synergies across costs between implementing a GPL proposal for triple play services and mobile phone services?**

Yes.

**Question 15: Do you consider that Option 2 (GPL) could enable consumers to go through the switching process through TPis/ PCWs? Would this be beneficial to consumers?**

MoneySuperMarket would welcome clarity on the meaning of this question as it could be read in the following two ways. Firstly, it could be interpreted simply as the PCW/TPI handling and passing on a switching request to the relevant suppliers, as is currently widespread practice across other industries (for example, energy or personal current account).

On the other hand it could also be interpreted more widely as PCW/TPis actually handling the entire GPL process.

Both options would, of course, be possible – particularly as the first is already in operation across other industries. However, the second would require a significant amount of planning and resource for any PCW to do successfully.

**Question 16: Do you have any other comments on the matters raised in Section 5?**

No.