## **Additional comments:**

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?:

Yes

Question 2: Do you agree that consumers would benefit from clearer switching processes and information about switching?:

Yes

## Question 3: Do you have any other comments on the matters raised in Section 3?:

Service Providers often blame a third party for errors during service changes (e.g. blaming OpenReach for missing appointments)

Also, when switching landline provider, retaining the current landline telephone number is often a key requirement but when a mistake is made and you lose your phone number, excuses are made that it is outside of the company's control. If a mistake is made, the gaining company should be responsible for correcting all errors and regaining your previous / current telephone number.

## Question 4: We would welcome views on the proposal for an EC&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? :

Option 1 does not go far enough.

## 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?:

Option 2 will only work if the gaining provider is fully responsible for ALL areas of a switch and must correct any errors made during the switch, preferably with little involvement from the consumer

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?:

No opinion

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

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

6 to 12 months should be more than enough time

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

No

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

No opinion

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?:

No opinion

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

Yes

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

No opinion

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?:

Yes

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

No