

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

**Question 1: Do you agree with the proposal to introduce an Approval Logo?
Please explain your reasons for your response:**

No.

believes it is unnecessary to introduce a logo for the following reasons:

♣ Approval logos are normally introduced where there is freedom in the market to set up voluntary schemes and where there is a risk of poor quality in that market. As the metering and billing scheme has been approved by Ofcom and monitored by certified Approval bodies there is an expectation that it will be of a sufficiently high standard.

♣ Approval logos are normally introduced to give customers the assurance that a scheme is robust and reliable in comparison to alternative schemes. In this case there is only one scheme, which is mandatory.

♣ There would be no benefit of having an approval logo when there is only one scheme in the market.

♣ The approval of TMBS is not a self-regulatory initiative, but a formal one. General Condition 11 places a regulatory requirement on any PATS provider with a relevant turnover exceeding £40 million (in the last year) to obtain formal approval of its TMBS, so it is mandatory for them to be assessed under the scheme regardless of whether there is an approval logo or not.

♣ Those organisations without approval because they do not generate £40 million will be at a competitive disadvantage in the market.

Question 2: Do you agree with the proposed changes to the Direction? Please explain your reasons for your response.:

No.

believes it is unnecessary to introduce a logo in the first place.