

Ofcom: Review of the Metering and Billing Direction
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Introduction

The [Federation of Communication Services](#) is the UK trade association for the professional communication services sector. Our 400 members and associates deliver voice and data functionality and services to business and public sector users by means of copper, fibre and radio transmission infrastructures. We are pleased to have the opportunity of responding to the Ofcom consultation on revisions to the Metering and Billing Directive.

Overview

The FCS is pleased to note Ofcom's decision to keep wholesale services within the scope of the Direction insofar as the process-based requirements are concerned. Whilst we note the reasons for not including the tolerance levels we should reiterate that the receipt of wholesale billing that is both accurate and timely is vital for our members. However, we hope that maintaining a watch on the process requirements (in particular "System infrastructure" and "Billing activities including credits and adjustments") will assist our members in producing accurate bills for their customers.

Answers to Ofcom's Questions

Q1 We invite stakeholders' views on the proposed removal of target-based requirements across all retail services and evidence to support their views

We agree with the decision to remove the target based requirements for the reasons set out by Ofcom.

Q2 We invite stakeholders' views and evidence on the practicality of the proposed new timeframe for approval as set out in paragraph 5.1 of the draft new Direction.

The FCS has no evidence to agree or disagree with this decision.

Q3 : We invite stakeholders' views on whether the proposed revised definition of EPF would be workable. We also welcome any alternative suggestions for the definition.

We are comfortable with the proposed revised definition and believe this should meet the intent behind it.

Q 4: We invite stakeholders' views on the proposed timeframe for delivery of CDRs as set out in paragraphs 7.1 of the Direction. If you do not agree, please provide evidence to support an alternative approach or timeframe.

The FCS welcomes the tightening of requirement on delivery times for wholesale bills to CPs. As discussed in the overview to this response, our members depend upon accurate and timely receipt of wholesale bills in order to be able to discharge their obligations under the direction. Proper end-user billing relies upon an upstream chain that works efficiently to deliver the required information.

Q5: We invite stakeholders' views on the proposed non-material changes to the Direction

We have no comments on the non-material changes proposed.

Q6 We invite suggestions on these and other ways in which awareness of the Scheme can be promoted.

We agree that the information held on the Ofcom website could be improved, not least by a having a list of those CPs who have gained approval (and whether required or voluntary) in an easy to find way. The ABs websites do not offer this information in an obvious way when the links from Ofcom's website are followed.

We would hope that greater transparency along with improved consistency against standards between ABs will lead to better performance against the process based targets and therefore better outcomes for retail CPs and consumers alike.

Conclusion

The FCS welcomes the moves towards a more universal and consistent approach across service types as well as wholesale and retail billing. We believe that close scrutiny of processes by the ABs should lead to better performance across all aspects of metering and billing.