

MABABF Response to the Metering and Billing Direction Consultation

Question 1 *We invite stakeholders' views on the proposed removal of target-based requirements across all retail services and evidence to support their views.*

Removal of target based requirements will assist CP's as follows:

- To focus more on corrective and improvement action without being distracted by the possibility of breaching the targets;
- Resource utilised to implement reporting structures may be better utilised elsewhere in consolidating more meaningful performance and BAU metrics that support their TMBS in terms of:
 - o Potential inclusion of voluntary services and integrated processes;
 - o Flexibility for future proofing as new services and processes are developed;
 - o Increased focus on customer perception and experience;
- CP's with large retail customers may breach targets with a billing accuracy issue affecting only one customer while still having a robust TMBS; and
- Removal of targets is likely to increase participation by smaller SPs that are currently under the mandatory reporting threshold.

Question 2 *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.*

In AB collective experience, the cumulative approach provides flexibility and the 24 months between agreeing an approval plan and achieving initial approval is adequate.

Question 3 *We invite stakeholders' views on whether the proposed revised definition of EPF would be workable. We also welcome any alternative suggestions for the definition.*

The proposed definition of EPF "An Extraordinary Performance Failure is a clear spike in or movement away from monitored performance...." is workable in the collective opinion of the ABs.

Question 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.*

In the absence of a commercial agreement or contract between Wholesale and Retail CPs, an equitable division of the allowable billing time between Wholesale CDR delivery and Retail CP billing seems a sensible and pragmatic approach to billing timeliness giving all in the supply chain the ability to gain the revenue due to them.

Question 5 *We invite stakeholders' views on the proposed non-material changes to the Direction?*

The non-material editorial changes to the Direction now facilitate clearer understanding and interpretation of the requirements of the Direction without the reliance on any Guidance documentation.

Question 6 *We invite suggestions on these and other ways in which awareness of the Scheme can be promoted.*

Anything Ofcom can do to make the benefits of the Scheme visible to the public would be beneficial, for example:

- Working more closely with the Ombudsman;
- Working more closely with Arbitration bodies to raise awareness; and
- Encouraging CP's to advertise when they gain approval.