

## Consultation response form

Please complete this form in full and return via email to [broadband.speeds@ofcom.org.uk](mailto:broadband.speeds@ofcom.org.uk) or by post to:

Celia Pontin  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	Broadband Speeds Code of Practice
<b>Full name</b>	[X]
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Self
<b>Organisation name</b>	<b>(None)</b>
<b>Email address</b>	[X]
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)</b>	Name, email, phone number
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

<p><b>1.1 Question 4.7: Do you have any comments on the proposed changes to the codes, as outlined in this consultation document (including Annex 1)? Please provide reasons for your response. In particular:</b></p> <p><b>a) Do you agree that the codes should require the provision of speed estimates that reflect peak-time network congestion?</b></p> <p><b>b) Do you agree that the minimum guaranteed speed should always be given to customers at point of sale?</b></p> <p><b>c) Do you agree that, where a customer's speed falls below the minimum</b></p>	<p>Confidential? – No</p> <p>I wholeheartedly support this move. The long-standing current state of broadband pricing and advertising is essentially a bait-and-switch, and there is little protection for consumers receiving slow or no service.</p> <p>I have previously been provided with speeds of around 500kbps on a 24Mbit contract, just over the threshold at which current regulations permit me to cancel the contract. Reliability has also been an issue for me in the past, and no consumer broadband options offer QoS guarantees with terms that are meaningful to a home user.</p> <p>a) Speed estimates are difficult to calculate and</p>
---	--

**guaranteed level, there should be a limit on the length of time providers have to fix the problem before offering the right to exit?**

**Do you agree that the limit should be 30 calendar days?**

**d) Do you agree that the right to exit should also apply to a landline service sold over the same line, and to pay-TV services purchased at the same time, as the broadband service?**

**e) Do you agree that the codes should be capable of being applied in full to all standard fixed broadband technologies, including cable and FTTP?**

**f) How long do you consider that signatories should be given to implement the proposed changes following publication of the final version of the codes?**

communicate clearly, but this information is of paramount importance to the user when attempting to establish the suitability of a contract for a given purpose. Clear communication thereof would cause public opinion to shift from "the internet is slow" in the passive to "my ISP is failing to deliver a fast service". The latter of these is the truth.

b) Yes. I have previously attempted to find this and, though available, it is difficult to access and even harder to test in such a way that my ISP would accept the results. Issues of contention and other time-variant factors are likely to make this a hollow/statistical promise and I strongly suspect ISPs will come up with some excuse on this one.

c) Yes. In the event that my ISP fails to deliver service I am literally paying for service and receiving nothing. In any other world this would nullify my contract anyway.

d) Yes. Any service bundled with and dependent on the line should be subject to potential cancellation as provision of the broadband service is an unavoidable dependency.

e) Yes, though the manner in which an explanation is given should vary by product even if the same data are included. I would think, for example, that the way one would explain contention or latency on satellite connections would need to vary from FTTP.

f) As little time as possible. These are small cosmetic changes to marketing and copy --- the data and methods required to estimate the speeds required are already well known.

**Please complete this form in full and return via email to [broadband.speeds@ofcom.org.uk](mailto:broadband.speeds@ofcom.org.uk) or by post to:**

Celia Pontin  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA