

Consultation response form

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

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

Consultation title	Broadband Speeds Code of Practice
Full name	Stephen Howes
Contact phone number	[X]
Representing (delete as appropriate)	Self
Organisation name	
Email address	[X]
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing/ Your name / Organisation name / Whole response / Part of the response (you will need to indicate which responses are confidential)
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

<p>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:</p> <p style="padding-left: 20px;">a) Do you agree that the codes should require the provision of speed estimates that reflect peak-time network congestion?</p> <p style="padding-left: 20px;">b) Do you agree that the minimum guaranteed speed should always be given to</p>	<p>Confidential? – No</p> <p>The right to change provider if broadband speeds fall below estimate is largely pointless if all the carriers in a particular area are dependent on OpenReach for the connection to the premises (home/business). For example I have fibre broadband (FTTC) but only get 12Mbit due to distance from the cabinet. So no matter which ISP I use I will never get appreciably better speeds.</p> <p>A simple solution would be for people to pay for the actual speeds that they receive. This would incentivise the ISPs (and Openreach in particular) to provide the necessary infrastructure to give people the best connection possible.</p>
--	---

customers at point of sale?

- c) Do you agree that, where a customer's speed falls below the minimum 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?

Billing customers against actual line speed is perfectly achievable. Indeed some 20 years ago I was working for [X] where I was [X] and we had a product which my team developed where the customer paid for the actual throughput of the circuit.

I'm sure a similar model could be implemented for broadband (even if very basic and crudely based on router synch speed) then many of the other issues that you highlight in your proposals will simply disappear because market forces will come into play and the ISPs will be incentivised to maximise speeds and, as a consequence, their revenues.

As a first step, it might be useful if Ofcom were to ask the ISPs for minimum, average and maximum router synch speeds by postcode and then it would be possible to see real data on what sort of speeds people are actually getting rather than the estimates that the ISPs are currently touting.

Then, If as a further step, Ofcom wanted to enforce Quality of Service standards on the ISPs then you could measure this against the Synch Speed (ie Actual vs expected)

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

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