

1st September 2020

Response to “Implementing the new EECC, revised proposals”

Magrathea welcome the opportunity to respond to this consultation which includes revised proposals in areas we have previous had concerns with.

Response to consultation questions

Question 1: Do you agree with our proposed changes to the GCs and our Guidance on General Condition C1 in relation to annual best tariff information?

Yes, by greatly reducing the number of customers that need to be contacted to comply, the requirement will be less of a burden on service providers and will bring benefit where it is most needed.

Question 2: Do you agree with our proposal to remove financial thresholds from microenterprise and small enterprise customer definitions?

Question 3: Do you agree with our proposal to revise the headcount threshold for small enterprises down to 10 staff members and to merge this definition with that for microenterprises? Please provide evidence to support your view.

Question 4: Do you agree with our revised proposed definition of not for profit customer?

Question 5: Do you agree that the guidance we have proposed to help providers identify employee headcount should also apply to not for profit organisations?

We do agree with each of these four proposals. Adopting this approach will manage the great the number of concerns we had in relation to the changes, the arguments for which have been well defined elsewhere so we will not repeat them here.

Needless to say, we support your ‘Option 2’ approach and should further evidence be required we would be happy to seek individual inputs from our client base to furnish you with that if required.

Yours faithfully,
Magrathea Telecommunications Ltd