

Question	Your response
<p><b>Question 1: Do you agree with our proposed changes and additions to the defined terms used in the GCs in order to align with the EECC, as set out in Annex 11?</b></p>	<p>Confidential? – N</p> <p>We recognise the need to propose and align changes however we are worried about the timescales required to do this given the EECC transition is expected to be done by December 2020. The complexity of just one element, Switching brings a big headache to the industry let alone the proposed changes in many other areas likely to affect businesses like ourselves with regard to systems development, investment, staff training, process changes and customer service and support. While some changes are likely to be clarification and minor modifications others will have a much bigger impact and industry needs to have sufficient time to discuss, consult, reach agreement and then time to implement final solutions.</p>
<p><b>Question 2: Do you agree with our proposed changes to the GCs to implement Article 102, as set out at Annexes 11 and 16?</b></p>	<p>Confidential? – N</p> <p>Any changes to General Conditions should be set out with clear direction and consistency from Ofcom. The current level of complexity is concerning and we would like to see subsequent updates to information and documentation provided in a way that it is much easier to digest and plan for so that we can be confident that any decisions taken by us under regulatory change is clearly understood.</p> <p>Often we have to try to interpret Ofcom’s requirements as seen with some of the confusion with End of Contract Notifications between business and consumers.</p> <p>We would also like to see consistency and a much clearer definition relating to businesses and the sizes of organisations, which are currently defined by employee numbers and not always as straightforward as that when working within a regulatory framework that often sees complex business relationships.</p> <p>We would welcome a review of this with clear guidelines on businesses based on contract type which we believe would bring much needed consistency to this area.</p>

<p><b>Question 3: Do you agree with our proposed guidance in Annex 6 on our expectations for how providers should comply with the provision of contract information and the contract summary?</b></p>	<p>Confidential? – Y / N</p> <p>No comment</p>
<p><b>Question 4: Do you agree with our proposed changes to the GCs to implement Article 103 and our proposed approach to implementing Article 104, as set out in Annex 11?</b></p>	<p>Confidential? – Y / N</p> <p>No Comment</p>
<p><b>Question 5: Do you agree with our proposed changes to the GCs to implement the requirements in Article 105, as set out in Annex 12?</b></p>	<p><b>Confidential? – Y</b></p> <p>REDACTED</p>
<p><b>Question 6: Do you agree with our proposed changes to the existing guidance as summarised here and set out in Annex 7?</b></p>	<p>Confidential? – Y / N</p> <p>No Comment</p>
<p><b>Question 7: Do you support our proposals to introduce (a) new general switching requirements for all types of switches for residential and business customers and (b) specific switching requirements on information, consent, compensation and notice period charges for residential customers?</b></p>	<p><b>Confidential? – N</b></p> <p>Yes. Although the changes needed are likely to be complex, we support Ofcom and industry in looking at how we can work with them and industry to develop a system that allows customers to switch easily.</p> <p>We worked with industry and the OTA throughout a lengthy, complex and expensive exercise back in 2012 that involved significant investment in making all of the changes that Ofcom required under the move from the old Mac based Losing provider to a Gaining provider led switching model. The timeline to do that work was over two years and we are concerned that making a change to that now to a different model will incur significant cost and development work again when we are already investing significant time, resource and funding to other initiatives such as auto compensation, end of contract notifications and our own business wide projects. The complexities of multi wholesale network switching coupled with resolving number porting is not something we can afford to get wrong given the impacts on those customers to be served by doing so and we would urge Ofcom to allow sufficient time for whatever the final proposal is to be delivered.</p>
<p><b>Question 8: Do you support our proposed guidance in Annex 8 on compensation for residential customers?</b></p>	<p>Confidential? – N</p> <p>We are already providing auto compensation to</p>

	<p>residential customers under the current industry scheme and this is working well for delayed repair, delayed provision and missed appointments. We are not opposed to compensation under switching and porting so long as any proposed scheme is thought out, fair, proportionate and does not see retailers short changed by wholesale providers where SLG payments are less than the auto compensation the retailer has to pay out to its customers.</p>
<p><b>Question 9: Do you agree with our assessment that device locking can deter customers from switching and cause customer harm?</b></p>	<p>Confidential? – N N/A</p>
<p><b>Question 10: Do you agree with our assessment of the effectiveness in reducing the consumer harm that can result from device locking and the impact on providers of Options 1 and 2?</b></p>	<p>Confidential? – Y / N N/A</p>
<p><b>Question 11: Do you agree with our proposal to prohibit the sale of locked mobile devices?</b></p>	<p>Confidential? – Y / N N/A</p>
<p><b>Question 12: Do you agree that we should protect customers by issuing guidance on our proposed approach when considering the case for enforcement action against non-coterminous linked contracts?</b></p>	<p>Confidential? – Y REDACTED</p>
<p><b>Question 13: Do you agree with our proposed guidance in Annex 9 which sets out our proposed approach to assessing whether certain types of non-coterminous linked contracts are likely to act as a disincentive to switch?</b></p>	<p>Confidential? – Y REDACTED</p>
<p><b>Question 14: Do you agree with our proposal to mandate emergency video relay for emergency communications to be accessed by end-users who use BSL?</b></p>	<p>Confidential? – N  <p>Whilst we agree that providing an emergency video relay service for deaf customers would be useful, we are concerned that should a proposal put the onus solely with the ISP/voice provider this in itself could create inconsistency in the level of service delivered and required to ensure it remains resilient for the end user.</p> <p>Video relay involves so many variables when it comes to transmitting video traffic such as latency, bandwidth packet loss. Therefore, the idea of assurance around this worries us.</p> </p>

	<p>The idea of partnering with a third party similar to that which we do for WLR Next Gen Text Relay services may well reduce that concern as we would assume that service level guarantees would sit within their expertise and capabilities. With the providers obligation extending to a much more simplified service.</p>
<p><b>Question 15: Do you agree with our proposal that the obligation to provide emergency video relay free to end-users should be imposed on regulated firms that provide internet access services or number-based interpersonal communications services?</b></p>	<p>Confidential? – Y / N</p> <p>REDACTED</p>
<p><b>Question 16: Do you have any comments on our proposed approval criteria for emergency video relay services, or the proposed approval process?</b></p>	<p>Confidential? – N</p> <p>See reply to previous question</p>
<p><b>Question 17: Do you agree with our proposal to a) extend the current requirement to cover the other specified communications i.e. any communication (except marketing) that relates to a customer’s communication service, and b) extend the GC so that any customer who cannot access communications due to their disability should also benefit from accessible formats? When answering please provide evidence of any benefits or costs.</b></p>	<p>Confidential? – N</p> <p>Customers who require additional service and support is an important area. Interventions need to be appropriate, needs based and not a unilateral one size fits all approach.</p> <p>Often customers require additional assistance that might not necessarily be best suited for other customers.</p> <p>We want to give our customers the best experience possible and in ways which our customers can access and receive data in a format that is supportive of their needs.</p> <p>Industry has been working with Ofcom on initiatives to address and improve access to information and services for its customers with additional support needs and this has worked well with providers sharing their experiences to improve learning in an area that is often not so straightforward. These workshops we welcome.</p> <p>Often the provision of information in alternate formats has to go via a third party service which brings with it GDPR, Data Protection and commercial cost considerations.</p>

**Question 18: Do you agree that implementation by December 2020 is reasonable?**

Confidential? – N

The timescales are extremely short and sufficient time for service providers to carry out any regulatory or legislative changes must be realistic. Businesses post Brexit are facing uncertainty and any commercial, resource, development implications need to be fair and proportionate. Some of the proposals are big asks of industry such as Switching and Number Porting and could put significant strains on ISP's.

**Question 19: Do you agree with our proposed changes for implementing the requirements in Article 108 and Article 109 to reflect the differences between these EECC provisions and their predecessors in the Universal Service Directive?**

Confidential? – Y / N

No Comment