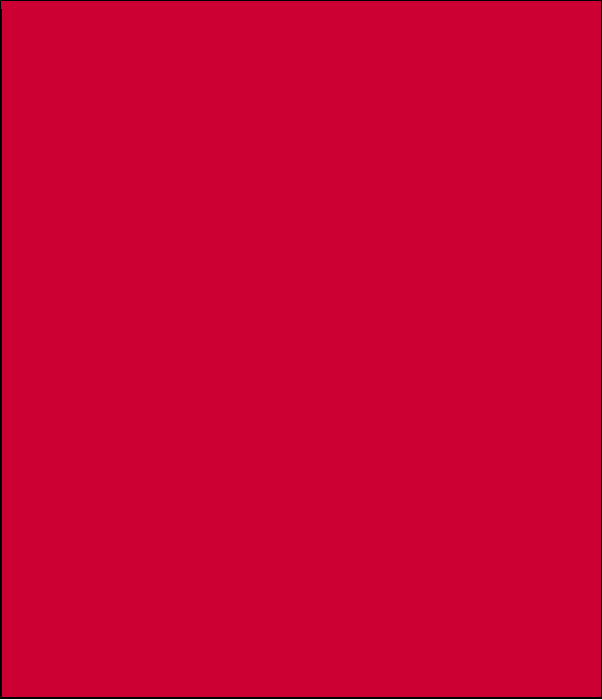


Question	Your response
<p data-bbox="204 394 751 528">Question 1: Do you agree with our proposed changes to the scheme criteria? Please provide evidence to support your views.</p>	<p data-bbox="810 430 1313 528">We support the proposed changes to the scheme criteria. We have a few notes and observations:</p> <ul data-bbox="858 573 1385 2020" style="list-style-type: none"><li data-bbox="858 573 1385 1102">• In various sections, the proposal refers to the provision of quality of service information as part of the comparison (e.g. sections 3.7, 3.17, 3.18, 3.21). Whilst we agree with the principle, we would need assurances that such data would be readily available in a cost-effective manner to be able to implement this for mobile services. For example, 3.18 notes that providers are already under an obligation to publish fixed-line speed information. To the best of our knowledge, an equivalent for mobile connections is not publicly available.<li data-bbox="858 1146 1385 1787">• Including measures to ensure accessibility is both necessary for accreditation by Ofcom and compliance with the Equality Act 2010. However, we believe the specific suggestions made in 3.78 are best implemented at the browser/OS level. Every popular browser includes well-established mechanisms to change font size, and there has been a notable recent push for colour adjustment in the form of high contrast or dark modes. We believe that duplication of this work would not be a good use of resources, and our responsibility is to ensure that any development is compliant with relevant legislation and browser/OS accessibility functionality.<li data-bbox="858 1854 1385 2020">• We are interested as to how Ofcom envisages comparison of ‘bundled’ services as referred to in 3.14, specifically with respect to ‘quad-play’ bundled services. If a service such as



HandsetExpert (currently accredited for mobile comparison) were to compare quad-play packages and exclude triple-play services (i.e. only look at landline+broadband+TV+mobile, and not landline+broadband+TV), would this be a separate comparison category that could receive accreditation? We would also be interested in Ofcom's future accreditation roadmap includes comparing 'friends & family' plans (multiple subscriptions covered by one bill).