

Your response

Question	Your response
<p>Question 1: Do you agree with our assessment of the challenges that people and SMEs face when engaging with the market, which Open Communications might help to address? Please explain and provide evidence.</p>	<p>Confidential? - N</p> <p>Yes – we believe that the market can be overwhelming, which can turn consumers off looking for and finding the best deals. Customers also struggle with general awareness around what deals are on the market (and the quality of those deals) as well as how their spending or usage might change due to changing their deals or how they use services. This is especially pertinent for vulnerable customers but spans across the entire population.</p>
<p>Question 2: Is there additional evidence of problems that people and SMEs face when engaging with the market that you would expect Open Communications to help address? Please explain and provide evidence.</p>	<p>Confidential? – N</p> <p>The over-complication of details around the deals available on the market means that customers have little trust in suppliers and re-sellers. This is evident in the comparison sites' required marketing spend to get people to switch. Improving trust could drive value for customers, suppliers and beyond.</p>
<p>Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?</p>	<p>Confidential? – N</p> <p>Absolutely, we are already working with suppliers to move in this direction. Open Banking has started to show the value a solution like this could drive for the consumer.</p> <p>We believe the benefits are evident beyond just the consumer – re-sellers can monetise anonymous data, data can help suppliers improve their services, financial institutions can help their customers make better decisions and so on.</p>
<p>Question 4: Do you agree with our assessment of how Open Communications could enable</p>	<p>Confidential? – N</p>

<p>services that benefit people in vulnerable circumstances? Are there other ways it could benefit people in vulnerable circumstances?</p>	<p>We have seen this at play in Open Banking. The secure support networks this could open for vulnerable people could drastically improve their quality of life.</p>
<p>Question 5: Are there any risks that we have not identified that could reduce the overall benefits of Open Communications? Please provide evidence, where possible.</p>	<p>Confidential? – N</p> <p>There are of course risks around sharing data but doing it in a way that is structured and regulated will always trump ways that aren't, in terms of risk to the consumer. The analysis is quite comprehensive otherwise.</p>
<p>Question 6: Do you agree with the core principles that we have identified for the design of Open Communications?</p>	<p>Confidential? – N</p> <p>Absolutely.</p>
<p>Question 7: On what kinds of communications providers do you consider that any obligation to provide customer and product data should sit?</p>	<p>Confidential? – N</p> <p>All. As an early stage FinTech business we understand the difficulties of being compliant with regulation, there is no reason a communications provider should not be able to adhere to these standards given an appropriate timeframe.</p>
<p>Question 8: Do you agree with our initial views on how to approach key issues for the design and operation of Open Communications? Do you have comments to make on other implementation issues?</p>	<p>Confidential? – N</p> <p>In a nutshell, yes. The pitfalls of open banking are the set-up costs to third parties (tech, insurance and licensing fees) and the replication of the same tools across the third parties (transaction categorization for example). The 6-step process seems simple and secure.</p>
<p>Question 9: Do you agree with our view of the data that Open Communications should make available to third parties? Is there data about accessibility needs or vulnerable circumstances that people would benefit from being able to share with third parties?</p>	<p>Confidential? – N</p> <p>Yes, although ultimately it should be the customer's choice as to which data they want to share. Accessibility information would be very helpful for third parties to react and</p>

	<p>support customers appropriately. Open data means we can be a lot more bespoke at scale.</p>
<p>Question 10: What are your views on the appropriate arrangements for determining liability and redress in disputes between customers, providers and / or third parties?</p>	<p>Confidential? – N</p> <p>Standards resulting from the initiative would be welcome, as they could work to clarify the liability of each party without an extensive negotiation between each party.</p>
<p>Question 11: Do you agree that we have identified the main sources of costs for implementing Open Communications for both providers and services that use Open Communications data? Are there any sources of costs that we have missed?</p>	<p>Confidential? – N</p> <p>Agreed.</p>
<p>Question 12: What factors will drive the overall scale of costs to in-scope communication providers and to third parties? How might this level of cost vary depending on whether providers serve residential and / or business customers?</p>	<p>Confidential? – N</p> <p>The clarification of who stores which data will inevitably define who bears the brunt of the costs in terms of data storage.</p> <p>It is in the long term competitive interests of the suppliers to make their products as easy to use, their API's as easy to integrate, as possible. Therefore, they will naturally face the bulk of costs in terms of making their deals easier to navigate and data easier to access.</p>
<p>Question 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.</p>	<p>Confidential? – N</p> <p>N/A – happy to discuss the parallels between this and Open Banking and provide an estimate in future meetings. As an early stage company, we are taking the cost hit on negotiating deals with suppliers already and will likely be impacted positively by the cost implications of Open Communications.</p>
<p>Question 14: If relevant, would your organisation consider using Open Communications data as a third party to offer new services or enhance existing ones?</p>	<p>Confidential? – N</p> <p>100% - we are doing this, regardless of the initiative!</p>