Your response

Question	Your response
Question 1: Respondents are invited to comment on whether they agree with Ofcom's preliminary view and to frame their views and responses with reference to, or in the context of, the statutory criteria in section 106(1A) of the Broadcasting Act 1990 (as amended).	I agree with Ofcom's assessment of the challenges faced by consumers when engaging with the market. While technology has opened plethora of options for consumers, it has also created complexity for non-technology savvy consumers and SMEs with simple/moderate complexity needs due to their nature of business. Conducting comparative analysis of best option based on both technical and economics parameters can get daunting for a person/stakeholders with limited understanding of exhaustive and growing options, for example -broadband technology options. Consumers are often not aware of service levels required for their needs and end up purchasing at higher end rather at an optimized plan. For example, it can happen that recruitment agency as an enterprise end up taking ultrafast BB plan, wherein their core requirement may suffice with Superfast one with SLAs, thereby leading to over spending on the services.
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.	With growth of both mobile and fixed broadband usage, QoS parameters like network coverage and quality along with downtime is fast becoming important areas. Open communications can also look into approach for using network and QoS data helping other consumers to take an informed decision. For example, if SME enterprise is opting for mobile broadband through FWA, it is important to check whether network coverage is at required level to suffice their business needs. Similarly, consumers maybe interested to know about downtime per annum to evaluate best provider for their connectivity critical usage.

Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?	Open communication is going to be a journey which can be mutually beneficial for people and businesses. Benefits of analysing generic consumer behaviour and trends is already a recognized model. An open communication for more refined data analysis will provide consumer specific focus areas outcome which can play critical role in their decision making. Similarly, higher accuracy of customer trends will help businesses create customer centric alignment in their business models. Even today, many mobile applications utilize customer data and, in many cases, use anti-patterns for obtaining approvals by default. Therefore, open communication framework will be an important step in defining roadmap for this journey. For example, if a SME today is looking for best plan which most of its peers are using, there maybe only generic trends available and not specific to its peers and by other parameters like location, network coverage, revenue turnover, data usage, value per GB, etc. Using self-declared information, same analysis can be provided by third party for help making this decision from variety of options
Question 4: Do you agree with our assessment of how Open Communications could enable services that benefit people in vulnerable circumstances? Are there other ways it could benefit people in vulnerable circumstances?	Open communication can help in initiating of better framework for guiding customers in vulnerable circumstances and Ofcom assessment and use cases are valid. Due to high growth of data usage especially during Pandemic times, networks are running at higher than predicted utilization. Similar situation can be expected with higher adoption of online activities along with active usage of streaming services on 4K/UHD content. Customer experience will have high dependency on ability of services to cater to consumer end consumption and whether it is meeting desired qualification. Even if customer uses standard insights as mentioned in use cases for pricing, speed, availability, etc. there can be still gaps regarding end usage performance. An active network performance feedback, can further help customer in determining better option depending on other QoS parameters for end use cases.

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.	Open communication will be a journey where active governance through people, process and technology will be key to success.
	Reason for quoting it as a journey is incremental learning and adoptability which will be required once implementation will begin. Paper has also highlighted key parameters which today may not be feasible to share but are important elements for open communications.
	As data sharing will begin, there are operational risks of data being sourced more with an active tilt for marketing than providing holistic model for comparative analysis.
	While Bolt and other apps are good examples for open banking, there maybe spurious apps which will try to source data for creating spams in the eco-system.
	Risk management governance is crucial to maintain a close tab on key stakeholders participating in this eco-system and adhering to established guidelines.
	There should be a mechanism for conducting health check, and not mere audit for usage of data and value it is generating for discussed purpose.
Question 6: Do you agree with the core principles that we have identified for the design of Open Communications?	Ofcom has identified holistic set of core principles which also covers approach as being discussed through cross -industry Smart Data Function.
	Since Open Communication will be a journey rather than just one time effort, we need to be open for any specific changes required to ensure efficient operating model including financial investments from providers and third party.
Question 7: On what kinds of communications providers do you consider that any obligation	Service providers with primary customer relationship should be obliged to provide

to provide customer and product data should sit?	customer and product data since they are in control of all shareable keys for data.
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?	Options being laid out in this paper provides feasible options on the table for open communications. There are always pros and cons of opting for either of model design i.e. directly through provider or through data trustee. Since there are active consultations for cross-industry open communications, Data trustee will eventually be better model for standardisation, regulation, data security and control and bringing any future changes to data or operating model. Model driven by option 1 wherein provider is key focal point here, there will be challenges in standardisation due to each provider creating their own design and dependencies may eventually rise as open communication evolve further Besides active security checkpoint, data ethics will be very critical element, something which can be controlled more effectively through Data trustee in Smart Data Function Smart Data Function will also provide a platform for scaling cross industry initiative for continuous business innovation along with an effective dispute management.
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?	Data through open communications should be made available to third parties. There are lot of evolving business models shaping up where entities are using Artificial Intelligence & Machine Learning for empowering better decision making by end customers. With so many options around and complexity linked to them, such data analysis can help customer in getting better deals. For ex, customer maybe continuing broadband services with A provider even with network problem & higher rates. Due to limited insights, customer is not able to proactively get insights with better options. With open communication enabled data, such third parties can provide such decision making to customers.

Question 10: What are your views on the appropriate arrangements for determining liability and redress in disputes between customers, providers and / or third parties?	Dispute management should adhere to Ofcom regulations for customer protection and redressal. There should be platform for customer to raise their dispute and providers need to play an important role in helping customers with any third-party related concerns as first checkpoint. There should be govt. bodies or Appellate where customer can escalate their concerns in case of non-satisfactory solution.
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?	Main source of costs has been largely identified in this paper. Setting up of data trustee will also incur additional cost and being shared function across parties will require govt led funding along with contributions from providers and third parties.
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?	Implementation of data platform and associated operating model will be critical cost for communication providers. Providers need to design their data operating model for creation of open communication data lakes including data governance. Data privacy will be dynamic entity and providers need to be ensure real-time governance. Third parties as consumption entity need to design their data operating model with strong security & compliance along with data maps linked to their specific use cases. Therefore, establishment of data platform and governance along with legal effort will be key factors driving scale of costs. Level of cost variance will depend on capabilities required for data management, security and customer data privacy. While general or blanket approvals of residential customer data works well due to limited set of parameters, enterprise customers require validation for each request in conjunction with their legal teams. There can also be other factors such as existing maturity of customer data as per demand from third parties. Providers need to plan for augmenting new capabilities to maintain competitive differentiation in market. Data is new oil of 21st century and hence building capabilities for open communication will be key for partnerships strength.

	Third parties also need to invest in AI/ML capabilities for effective usage of data for meaningful information. There maybe an additional costs for Authentication and data validation costs in case of trustee based model.
Question 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.	[✂]
Question 14: If relevant, would your organisation consider using Open Communications data as a third party to offer new services or enhance existing ones?	[✂]