

Your response

Question	Vour response
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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.	Yes. There is a bewildering array of service providers and at present and giving the same information again and again to each is time consuming and frustrating
Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?	Yes However as well as benefits there is also potential for missuse and data falling into the wrong hands
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?	Yes
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.	 Would create a lucrative data market between suppliers and interested parties – none of the profits of which would benefit the data owner Huge potential for the data to be misused by suppliers under the guise of providing services Huge potential for the data to be stolen, leaked, sold or otherwise missused

Question 6: Do you agree with the core principles that we have identified for the design of Open Communications?	Yes in general however given the industries record for data miss use and with little solid protection for the consumer from either Ofcom or ICO, I consider this proposal to be hopelessly naive to its negative consequences
Question 7: On what kinds of communications providers do you consider that any obligation to provide customer and product data should sit?	I think a dept of Ofcom should manage and host the data and sell it (NOT share it for free) with the consent of the user/data owner to selected/ potential 'subscribers' with the revenue going to run the service and profits going back to the data owners eg the public.
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?	In general, however the proposals lack detail of how this data would be protected
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?	Yes but see 7
Question 10: What are your views on the appropriate arrangements for determining liability and redress in disputes between customers, providers and / or third parties?	This further illustrates need for central data management – see 7
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?	Do not agree with providing free data to the industry to then be sold on for their own benefit and profit. Data owners should benefit and profit from the use of their own data.

	Third=Parties eg business who wish to sell them something should pay for the data. Revenue from this would pay for a central data management service and profits go to data owners.
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?	I do not know enough about this to comment. However I would think costs would include hosting data with a suitable reliable secure host such as Rackspace, costs for computer software, hardware and staff. Admin costs to liaise with the public/data providers and potential customers.
Question 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.	Think you are adopting the wrong costing model. Business costs should be to subscribe to the service.
Question 14: If relevant, would your organisation consider using Open Communications data as a third party to offer new services or enhance existing ones?	No