Your response

Question	Your response
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.	G.Network shares Ofcom's vision that the communications market should work well for everyone. We also welcome recent moves by Ofcom to put more power in consumers' hands, such as mandating contract reminder communications. We agree that successful engagement with the market can be challenging for individual consumers. Broadband speeds and data can be inherently difficult to describe in ways that can easily be visualised. As such, we tend to agree with Ofcom's view that some consumers could perceive communication products as being confusing and complex. As a company, we have attempted to minimise the number of products on sale, and use simple data points and visualisations to describe them. For most consumers, the thousands of possible permutations of providers, technologies, bundles and speeds could cause widespread confusion. We agree that this confusion is amplified when it comes to business connections, due to the extra products often considered by SMEs and Enterprises. As such, improved labelling of such connection technologies should be included in moves to make the marketplace easier for consumers to navigate.
Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?	We are interested in discussing any move that may bring benefits to consumers. However, we note that, as well as choosing a broadband company to buy from, consumers should be guided to consider which technology to purchase. Our view is that there may be widespread confusion in the market about the difference between ADSL, FTTC and FTTP connections. Even for customers who are technology agnostic, their choice of connection type will impact the performance it can deliver. Our view is that clearer product labelling would have a bigger impact in terms of consumer

empowerment than many of the potential measures contained in this consultation, and urge Ofcom to include it in scope.

We agree with Ofcom's suggestion that there is demand for better information about broadband reliability, and would welcome this being included in the criteria. Meaningful comparisons of speed should also take into account that these are harder to guarantee on older copper connections, and this should also be noted as a criterion.

We also agree that ready-made measures on customer service quality could be included. A simple way to measure this would be the inclusion of TrustPilot or Google reviews in these criteria.

However, we also urge Ofcom to keep the 'bigger picture' in mind when drawing up such regulations. The government, Ofcom and industry are all united in their goal to bring upgraded connections to consumers in the short-to-medium term. Regardless of technology, these connections come with significant bandwidth upgrades, whether or not that entire bandwidth is constantly used by the customer. Any move to encourage consumers and businesses to opt for older, less reliable transmission technology would, in our view, not be in their interest.

Furthermore, we point back to interventions that Ofcom has recently made, such as mandatory end-of-contract notifications. We believe Ofcom could consider further such lower-level, effective interventions as a more immediate way to help customers engage better with the market. These could include better product labelling, as mentioned above, or asking providers for greater clarity on price points. These would be in keeping with the current regulatory framework rather than creating a significant new regime which will take many months to implement effectively.

| **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?** | We welcome the idea of working with third parties in the charitable sector, such as debt charities, to enable them to access and manage this kind of information on clients' behalf. |

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.	[✂]
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?	We note Ofcom's initial view that information about customer contracts should be shared with third parties, including how the price will vary once the customer is out of contract. We note, however, that pricing is highly dynamic, and the projected out of contract price could regularly change before the customer reaches the end of that contract. These changes could be as a result of special offers, for example, or regular reviews of customer tariffs. As such this kind of information could only be considered as a snapshot, and comparison results displayed to a customer would have to note that only the current projected price is displayed.

If data usage is to be shared with third parties, Ofcom should consider over which period this should be collected and aggregated, in order to present an accurate picture.

We also note that Ofcom is considering including 'the different download and upload speeds your fixed broadband or mobile data connection delivers, recorded over time' (table, p44) in scope. This will present considerable difficulties and costs for communications providers, who will be required to keep detailed logs of this kind of information, for each customer, for an unspecified amount of time.

On the question of sharing product data (table, p46) we observe that Ofcom is considering including 'expected speed performance'. As Ofcom is aware, speeds vary considerably depending on where in a network they are measured, and whether they are measured on a wireless or wired basis. We suggest that further definition in this area will be needed.

If the proportion of missed engineer appointments is also to be shared, provision will need to be made for those appointments cancelled at short notice in circumstances beyond the provider's control (such as a customer not being available to receive the engineer). Furthermore, if this information is to be displayed proportionally, care must be taken |

	not to disadvantage smaller providers who by nature conduct fewer appointments. On a more general note, we suggest that the current scope would entail a large variety of data being collected and potentially presented to the consumer. This returns us to the problem Ofcom identified of consumers having 'too much choice' (3.14). As such, we suggest that Ofcom should define which data should be shared more narrowly.
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?	Ofcom has suggested sharing 'Average response times experienced by customers when reaching provider's customer service centre' (table, p46). We note that this could place a disproportionate financial burden on smaller providers.
Question 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.	We have not conducted a formal analysis of the costs of collecting and providing this kind of data to a third party. However, we suggest that the costs of standardising such data will be considerable. Established market members may have established data teams who are able to produce this kind of information more quickly and easily than newer entrants. Care must be taken when designing this process not to unduly benefit larger organisations.