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.	Confidential? – N Yes, we agree with your assessment. This echoes the challenges faced by consumers and SMEs in the banking industry that resulted in the implementation of Open Banking for the UK and which is being followed by markets such as Australia in pursuing a wider, Consumer Data Right.
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.	Confidential? – N We believe that consumer interaction will be more limited with Communications providers compared with (e.g.) bank and other financial services due to typically longer contracts, perceptions of powerlessness, and friction experienced in contacting providers.
Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?	Confidential? – N Yes. Raidiam has been involved with the delivery of Open Banking in the UK since before the formation of the OBIE and has had close-hand experience of the benefits that secure, consented data sharing can bring.
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?	Confidential? – N Yes. From the Open Banking experience, we have seen vulnerable people benefit from increased visibility, control and granularity of data, leading to better access to products, and better rates for existing products through the 'unbundling' of product features (e.g. overdrafts in the banking space).
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.	Confidential? – N Our experience with Open Banking highlights that implementation and technical security risks can be managed and understood through using global best practise. There is a potential danger in an Open Communications world that consumers who do not wish to share data will be cut off from the

	best deals. This should be countered by the benefits to all consumers who do take the opportunities afforded by data sharing, but the risks could be more concentrated in future.
Question 6: Do you agree with the core principles that we have identified for the design of Open Communications?	Confidential? – N

Yes. Raidiam was involved in the design, development and delivery of the Open Banking principles which appear to be adopted in the proposed approach to Open Communications. We have provided a research paper for BEIS around Authentication, and are currently deploying our Trust Framework Directory platform, built on the same principles as Open Banking, for use in the Energy Sector through the Modernising Energy Data competition. |
| **Question 7: On what kinds of communications providers do you consider that any obligation to provide customer and product data should sit?** | Confidential? – N

We believe that consumer data should be visible, controlled and clearly within the control of the consumer. Therefore, any organisation providing consumers with data should be obliged to share that data (securely) when directed by the consumer. |
| **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?** | Confidential? – N

Yes. Raidiam was involved in the design, development and delivery of the Open Banking principles which appear to be adopted in the proposed approach to Open Communications.

We are currently looking at the implementation of a data sharing ecosystem for Energy which is following similar approach to the definition of Liability, Consent and Authentication.

We have provided a research paper for BEIS' Smart Data project around Authentication and its implementation in different sectors:

https://www.gov.uk/government/publications/smart-data-research-on-consent-liability-and-authentication |
| **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** | Confidential? – N

We believe that consumer data should be visible, controlled and clearly within the control |

circumstances that people would benefit from being able to share with third parties?	of the consumer. Therefore, any data currently held by consumers (which would include accessibility needs) should be shareable by the consumer under an Open Communications framework.
Question 10: What are your views on the appropriate arrangements for determining liability and redress in disputes between customers, providers and / or third parties?	Confidential? – N We are currently looking at the implementation of a data sharing ecosystem for Energy which is following similar approach to the definition of Liability, Consent and Authentication. Our colleagues at DGEN also provided input to BEIS' Smart Data project around Liability and Consent: https://www.gov.uk/government/publications/smart-data-research-on-consent-liability-and-authentication
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?	Confidential? – N Yes. We believe that you have identified the main sources of costs as experienced by Open Banking development. However, we believe there are lessons, approaches and crucially, technologies which can reduce the implementation costs and timescales for new sector implementations. Digitisation and API-first implementation is now far more understood, and familiar than it was in 2015 when Open Banking was conceived. Therefore we believe that some of the challenges of making data available, using modern digital architecture, should be already well in train. If not, there are many more options and multiple commercial providers who can provide that type of support very competitively.
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?	Confidential? – N For providers and third parties, the technical development costs will be driven by the state of the existing infrastructure. All companies in all sectors are now looking to provide digital experiences and access for their customers (or at least for their staff with the rise in remote working), and so the requirements of Open

| | Data Sharing should not be significant on top of a core modern digital architecture.

Regulatory requirements will drive the next bucket of costs - however, these again should not significantly alter the competitive landscape if the sector is already regulated.

The final area of costs, of managing technical connectivity can be minimised by the use of Directory Trust Framework technology (as used in the Open Banking ecosystem). |
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| **Questio n 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.** | Confidential? – Y

[✂] |
| **Question 14: If relevant, would your organisation consider using Open Communications data as a third party to offer new services or enhance existing ones?** | Confidential? – Y

[✂] |