Uswitch

Uswitch response to Ofcom's consultation on Open Communications

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Contact

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Uswitch position on Open Communications

1.1   Uswitch is the UK's leading comparison website for home services switching. Launched in September 2000, we help consumers save money on their gas, electricity, broadband, mobile, TV, and financial services products and get more of what matters to them. Uswitch is part of RVU, a digital marketing business including the Bankrate UK, Money.co.uk and Uswitch businesses.

1.2   Uswitch agrees with the aims of the Open Communications project. Many customers perceive communication services as complex and the trend will continue with more services being introduced to the market. Third parties can help customers cut through the complexity to quickly search for new deals.

1.3   The role of third parties in helping achieve better customer experience is undeniable. Better access to customer data could help unlock innovation and deliver better customer outcomes. Service providers cannot hold on to consumer data and consumers should have control over who they share their data with.

1.4   Through working with our partner communications providers, we know that data sharing can be beneficial but complex to achieve. We look forward to engaging with Ofcom in the future, as its thinking on Open Communications develops, to share our experience and help shape the project in a way that would deliver the most value to customers.

1.5   While we understand Ofcom is at an early stage of developing Open Communications, in order for the ultimate solution to deliver the benefits outlined in the consultation, it should meet the following criteria:

   - **All pay TV, broadband and mobile providers should be mandated to participate**. It is the only way to ensure a level playing field between providers and best outcomes for all customers.

   - **It should be easy for customers to use**. Complicated customer verification and third party authentication will increase drop-off rates, leading to lower adoption of Open Communications.

   - **It should allow for a simple way for third parties to get repeated access.** Ongoing access to customer data will be key to unlocking most innovative ways to use the data.

   - **Technology should allow for immediate access to data.** Any delay in fulfilling a data request would lead to a lesser appeal to third parties.

Potential user cases for Open Communications

1.6   The most obvious and immediate user case for Open Communications is facilitating better and more personalised comparison. Giving consumers the power to share their data with third parties can be a powerful tool to help them easily access wider market and more relevant deals. Currently customers need to understand a certain level of jargon used to describe their service to make meaningful use of product and price comparison services. Open Communications could help to eliminate those barriers to

engage, making it easier for customers to get deals that are most appropriate for them. To best achieve this objective, Open Communications should cover all elements of telecommunications bundles, e.g. pay tv, broadband, landline and/or mobile. Ofcom should also include the names of the provider and the package as data fields. It would help customers identify whether the data received from the provider is correct and help third parties validate customer's requirements.

1.7 Customers will also benefit from more accurate information about suitability of products that does not require personal data to deliver. Address level broadband speed or signal strength could help third parties give more accurate advice whether the product would work as advertised. For example, we see that broadband customers do not always get the broadband speed advertised, as the speed at their address does not match the average used in the description of the broadband deal. Mobile signal strength data can be similarly misleading. Going forward, 5G coverage will be increasingly important and should also be considered as part of service data provided under Open Communications. Data on broadband speed or signal strength would not be considered personal and we see a benefit of separating it from other, personal contract related, data to make sure access is proportionate to the level of risk data carries.

1.8 Granting third parties ongoing access could enable Open Communications to strengthen the work already started by Ofcom in engaging customers at the end of their fixed contracts. Most customer contracts in mobile and broadband are between 18 and 24 months and customers can forget when they are coming to an end, or not open or act on their End of Contract Notification sent by the communications provider. Third parties could help customers find better deals at the time based on the usage data collected over time. Consumers should be able to easily grant third parties ongoing access for long periods of time (up to 24 months, in line with common contract lengths) and the process should not be overly burdensome and appropriate for the data requested, which would be simplified if sensitive data is excluded from Open Communications.

1.9 While the user cases above would undeniably benefit customers, most value would be added if Open Communications becomes a part of a wider, cross-sector data sharing initiative. Customers are looking at third parties for a variety of products, such as mobile, broadband, energy, insurance, etc. Understanding cross-sector customer habits would help tailor propositions for customers across all sectors the third parties operate in. In addition, having consistent data standards would make it more straightforward for third parties to comply with access requirements, leading to higher incentives to invest in innovative products that are based on data sharing.

Customer verification and authentication

1.10 Key to ensuring wide adoption of Open Communications will be an easy customer journey. To achieve this, customer verification will be crucial. Customers should be confident in providing the information required to verify their identity and find it easy and quick to do so. The more complex verification requirements are, the more likely for

users to drop off the journey, reducing the incentives for third parties to engage with the solution.

1.11 Verification will also be key to ensuring data privacy is protected and the process should be proportionate to the level of risk the data carries. To reduce the number of fields containing personal data, we suggest some information is provided by the user at verification that could then be used to authenticate the account, for example, asking customers to input their name and address, rather than requesting the data via Open Communications.

Accreditation

1.12 As mentioned in 1.7, we do not see all data proposed for Open Communications as personal. Accreditation should reflect the sensitivity of data third parties are looking to access. We, therefore, do not think that access to data that isn't personal, such as network performance in certain locations, should be in scope for the accreditation scheme.

1.13 To ensure cross-sectoral applicability, we agree that the accreditation scheme for Open Communications should be in line with what is already present or is being considered in other sectors. Ofcom should work with the Government to agree on an accreditation scheme that could be used across multiple sectors. We see this as a future proof solution.

1.14 We do not see a benefit in adopting a sector specific accreditation scheme for Open Communications. The principles of data sharing should be the same regardless of the data being shared and a cross cutting accreditation scheme would be the most cost effective way to achieve consistent treatment of data. With other industries considering their own data sharing projects and most third parties already working across multiple sectors, we see it as a perfect opportunity for the regulators to work together to ensure accreditation is done consistently and in a way that best protects consumer interests.