

Additional Notes from WonderBill:

In our responses below we cite results of surveys. The surveys in question were conducted with reputable 3rd parties (CensusWide and OnePoll) with UK nationally representative samples and with large sample sizes (n=3000). Surveys were conducted in Feb 2018 and in early March 2020 (pre-lockdown). We are happy to discuss the surveys in more detail separately if that would be useful.

This response represents WonderBill's views and not those of its parent company or any other entity within the corporate group.

Your response

Question	Your response
<p>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.</p>	<p>Yes, the challenges OfCom expresses align with our experience. This experience comes over the last 4 years in WonderBill with consumers (300k+ downloads, £500m in annual bills managed), numerous consumer interviews, 2 large scale surveys (n=3000, nationally representative samples) as well as some smaller scale surveys</p>
<p>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.</p>	<p>Yes – from the experience, interviews and surveys outlined in Q1.</p> <p>Additional challenges/problems that we see include:</p> <ul style="list-style-type: none"> • It is difficult for consumers to spot providers over-charging them and 18% of UK adults cite this as their biggest worry about their bills [source: survey] • 42% of consumers do not think they can save anything on their household bills [source: survey] • Of the 58% of consumers who think they could save money on their household bills, they generally underestimate the savings they can make by a significant factor of at least 2x [source: survey] • Complex bundles make it difficult for consumers to understand their 'next best action' e.g. whether to unbundle/bundle particular services [source: interviews]

<p>Question 3: Do you agree with our view of the benefits for people and businesses that Open Communications could generate?</p>	<p>Yes, we agree with OfCom’s view, but there are additional ones we observe too including:</p> <ul style="list-style-type: none"> • Enabling 3rd parties to advise customers on where/how to consume less in order to save money [source: user interviews] • Enabling 3rd parties to advise customers on where/how to consume in a smarter way in order to save money [source: user interviews] • Enable 3rd parties to facilitate cancelling of old contracts. 46% of UK Adults cite cancelling old contracts as moderately, very or extremely painful [source: survey] • Enable 3rd parties to managing bills when moving home. 44% of UK Adults cite moving contracts to a new address when moving home as moderately, very or extremely painful [source: survey]
<p>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?</p>	<p>Yes, we agree with OfCom’s view, but there are additional ones we observe too including:</p> <ul style="list-style-type: none"> • Enabling people to more easily look after the bills of vulnerable people e.g. elderly relatives. 7% of UK adults say they look after bills of others in these circumstances [source: survey]
<p>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.</p>	<p>Yes, we believe all providers should be part of Open Communications (i.e. not excluding small providers) as otherwise there will likely be impacts on the credibility with consumers of price comparison services powered by it but we agree with OfCom that the approach towards implementation must be proportionate, recognising the challenges that different organisations may have. This could include, for example, phased or staggered implementation.</p>
<p>Question 6: Do you agree with the core principles that we have identified for the design of Open Communications?</p>	<p>Yes</p>
<p>Question 7: On what kinds of communications providers do you consider that any obligation to provide customer and product data should sit?</p>	<p>(same as Q5)</p>

<p>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?</p>	<p>In general, yes, we agree.</p> <p>The 'data trustee' is a useful option to consider, and would work to limit concerns from providers around liability for authentication, but does need some consideration. In particular, it would need to be designed in a way that does not throttle innovation in the longer term as services emerge to use the platform in ways that were not envisaged in the original architecture. The governance of changes to the 'data trustee' would also need to promote innovation rather than whatever new status quo emerges.</p>
<p>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?</p>	<p>Yes.</p> <p>One example (stated already in Q4) is to enable people to more easily look after the bills of vulnerable people e.g. elderly relatives. 7% of UK adults say they look after bills of others in these circumstances [source: survey]</p>
<p>Question 10: What are your views on the appropriate arrangements for determining liability and redress in disputes between customers, providers and / or third parties?</p>	<p>Ofcom is right to look at the issues around determining liability and redress. It will of course be important clearly to define and communicate the responsibilities and obligations on each of the third party and the provider to avoid boundary disputes that impact on the customer. While the telecoms arrangements could be extended for customers in an open data context, it's not clear that cases of mis-selling, misleading advice or misuse of data fit entirely comfortably within it. We do consider that new arrangements may be needed to resolve disputes as between providers and third parties. The challenge here is to consider whether issues are bilateral only, or indicate issues impacting more widely. If the former, a form of commercial dispute resolution, on an expedited basis, may be appropriate. If the latter, it may be appropriate to consider a form of escalation process depending on the wider governance process for open communications/data. Ofcom may want to consider a type of dispute "early life support" in the start-up phase to explore the types of dispute that arise, enabling a form of real time verification of mechanisms in place</p>

	and that they are most effective and efficient in dealing with these disputes.
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?	[X]
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?	[X]
Question 13: If relevant, please estimate and describe, as far as possible, the costs to your organisation of implementing and running Open Communications.	[X]
Question 14: If relevant, would your organisation consider using Open Communications data as a third party to offer new services or enhance existing ones?	Yes. [X]