

Your response

Question	Your response
<p>Question 1: Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to</p>	<p>Confidential? – N</p> <p>FCS represents its small to medium CP members, many of whom provide mainly services to business customers as well as residential customers. FCS concerns are based on the fact that our members could potentially be disadvantaged if generic compliance guidance on dealing with debt is implemented or mandated.</p> <p>FCS accepts the need for generalised guidance but feels that any guidance (or mandated guidance) needs to take account of and potentially differentiate between business and residential (where in some cases specific duty of care is required) and that any guidance should not hamper CPs getting in revenues utilising different timescales and engagement with their customers, based on their own operational model and differentiated customer base.</p> <p>FCS feels strongly that there are very different issues to consider for residential and business customers, for very small/small/medium providers versus the very large providers and also the very different circumstances a wide range of business and residential customers experience.</p>
<p>Question 2: Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to.</p>	<p>Confidential? – N</p> <p>FCS accepts the need for generalised guidance but feels that any guidance (or mandated guidance) needs to take account of and potentially differentiate between business and residential (where in some cases specific duty of care is required) and that any guidance should not hamper CPs getting in revenues utilising different timescales and engagement with their customers, based on their own operational model and differentiated customer base.</p> <p>FCS feels strongly that there are very different issues to consider for residential and business customers, for very small/small/medium providers versus the very large providers and also the very different circumstances a wide range of business and residential customers experience.</p>

<p>Question 3: Do you agree that there should be more consistency in the way in which providers seek to effect payment from customers in debt? If so, how do you believe this could be achieved most effectively? Please provide evidence supporting your views, including any research you have conducted or have access to</p>	<p>Confidential? – N</p> <p>FCS feels strongly that there are very different issues to consider for residential and business customers, for small/medium providers versus the very large providers and also the very different circumstances a wide range of business and residential customers experience.</p> <p>Many smaller CPs cannot afford to let customers continually run up large bills and line rental for lengthy periods of time without payment and while following engagement guidance and mindful of the difficult situations business and residential customers experience, in some circumstances, after a period of time are left with no option but to suspend and then in some cases disconnect service.</p>
<p>Question 4: Do you agree that we should amend the guide regarding the provision of information about measures to support customers? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to.</p>	<p>Confidential? – N</p> <p>FCS believes that Ofcom research on guidance implemented in the energy sector (where there are separate processes for businesses and residential consumers) would be of benefit.</p> <p>Where CP re-sellers are involved, FCS also questions whether the whole supply chain could share some of the debt process/guidance burden and whether this aspect could be included in Ofcom's thinking going forward.</p>

Please complete this form in full and return to debt.review@ofcom.org.uk.