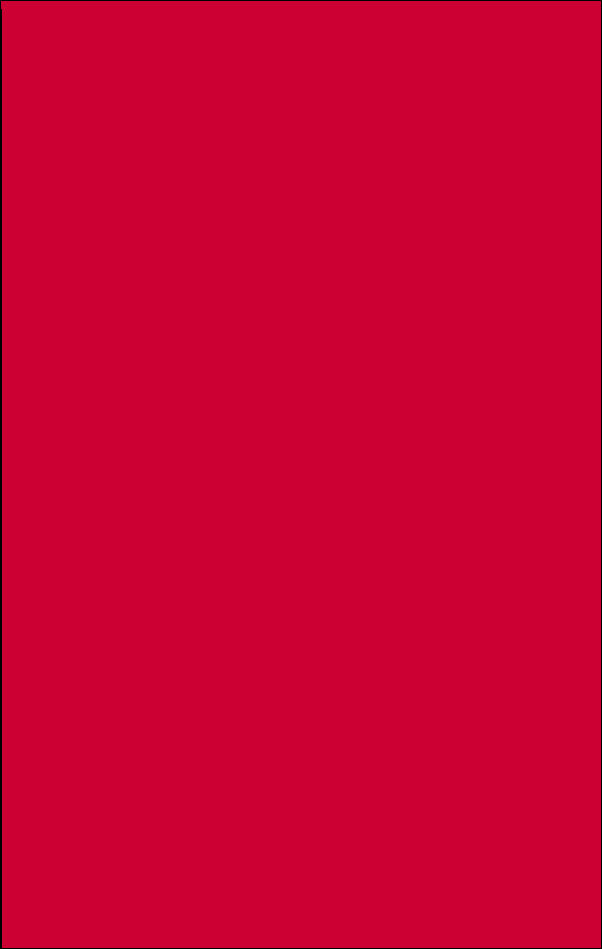


Your response

Question	Your response
Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.	<p><i>Is this response confidential? – N</i></p> <p>We broadly support Ofcom’s proposed amendments to the treating vulnerable customers fairly guide, as we have done in previous proposals and amendments that help customers who face financial difficulties or are vulnerable.</p> <p>Customers are facing challenging times given the financial impact the economy is having on us all - Communication Providers included. We have seen a noticeable rise in customers struggling to pay for the services they receive, and we look at those sympathetically on a case-by-case basis.</p> <p>We believe we meet current compliance requirements, yet we also recognise that we could do more. We are looking at this to see what we would need to do such as supporting Ofcom’s enthusiasm for a low-cost tariff option for those customers who are most at need.</p> <p>One of the challenges we face is identifying customers who need our support. It would be of great help if Ofcom could work with industry to agree a set of definitions that would provide clarity and reassurance about working with customers who we believe may be at risk.</p> <p>Agreeing a clear set of definitions with Ofcom has helped some CPs and its customers historically to ensure there are no misunderstandings, for example where we agreed on the payments for auto compensation under the voluntary code of practice.</p> <p>Our intention will always be to try to find the best solution for the customer, where possible, but not all customers who struggle to pay for their services are financially vulnerable so some additional guidance in this area would be welcome.</p> <p>Disconnection of customers unable to pay their bills is not something we would do lightly - only</p>



as a last resort. Disconnection would not be considered to force payment of outstanding bills; however, we do have concern that some may see affordability as a way to avoid paying their bills under these proposed changes.

If a customer was to cancel their service on the grounds of affordability, then we could offer them a repayment plan to support them in their recovery from any arrears incurred. Having clear definitions of circumstances which constitute a vulnerability or affordability issue for customers in need of debt support would greatly help in these situations.

Ofcom and Industry have made good progress regarding vulnerability in the last few years. Continuing to work together in this way will not only protect customers from harm, but it will also provide clarity and certainty for CPs.