

Consultation response form

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

Consultation title	Mobile roaming: Strengthening customer protections
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Verastar Limited
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>Question 1: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to send customers roaming alerts that include information on roaming charges, mobile bill limits and where to access more information?</p>	<p><i>Is this response confidential? – N</i></p> <p>Yes, we agree in principle to the proposals. However, we anticipate that this will involve significant work for MVNOs and re-sellers.</p> <p>Currently, MNOs send out generic data roaming messages on behalf of MVNOs and re-sellers. However, the MNOs do not have access to personalised customer information such as mobile bill limits and specific roaming charges to enable them to include this in a communication when the customer starts roaming.</p> <p>Therefore, a software solution will be required to overcome this data gap for MVNOs and re-sellers to be able to comply.</p>
<p>Question 2: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to (a) have and publish measures to enable customers to reduce and/or limit expenditure related to inadvertent roaming while in the UK and (b) provide information on how to avoid inadvertent roaming both in and outside of the UK?</p>	<p><i>Is this response confidential? –N</i></p> <p>Yes, we agree in principle to the proposal. However, we do have one concern which is:</p> <p>How would an MNO, MVNO or re-seller be able to differentiate between inadvertent roaming and intentional roaming?</p>
<p>Question 3: Do you agree with the proposed implementation period of 6 months from publication of the statement and changes to General Condition C3 and guidance?</p>	<p><i>Is this response confidential? – N</i></p> <p>As referenced in our answer to question 1 above, a software solution would be needed for MVNOs or re-sellers to comply with the proposals.</p> <p>We anticipate that this may take longer than 6 months to implement.</p>

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