

Your response

Question	Your response
<p>Question 1: Do you agree with the areas we are planning to cover as part of this review? Are there additional areas we should take into account?</p>	<p>Confidential? – N</p> <p>We agree with the areas planned to be covered as part of the review.</p> <p>We suggest that, in addition, Ofcom considers whether the schemes are appropriately set up to manage the range of providers in the industry and the different issues that consumers may have with a large ISP compared to small alternative full fibre broadband network provider (“Alt-Net”). We suggest that Ofcom consider whether Alt-Nets are receiving fair, proportionate and consistent outcomes from the ADR procedures given the significant challenges faced by Alt-Nets building new pure full fibre networks. There should be consideration of the quality controls and training in the providers’ staff and management to ensure they are fully aware of the basis of the schemes they are operating and the different challenges that may arise from the different types of business and technology now available to consumer.</p> <p>We further suggest that Ofcom should consider the funding of the scheme providers. It should consider whether it is appropriate that charges are made even in cases which are outside the ADR scheme provider’s terms of reference. A funding structure related either to prior claims record or possibly customer numbers would be a fairer means of funding the schemes and would remove any incentive that the scheme provider might theoretically have for accepting cases which are outside its jurisdiction or which are clearly vexatious and without merit.</p>
<p>Question 2: Do you have any comments on the issues raised in relation to these areas? Please provide any supporting evidence that you think we should take into account.</p>	<p>Confidential? – N</p> <p>With regards to facilitating access to ADR, we acknowledge that consumer bodies have argued there should be a lower timeframe to access ADR. Whilst this may be feasible in certain cases, as an Alt-Net we are of the view that the period of time of 8 weeks should remain. This timescale is particularly required where a consumer may have an issue with the delivery of network in-</p>

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	<p>frastructure to their property or connection to a network, which will require significant investigation and involve third party contractors. We would like Ofcom to examine how the scheme providers have approached different types of case so that it can assess whether the scheme providers are able to understand and manage the challenges that new technology may bring and avoid a one-dimensional approach to consumers complaints which is not fit for purpose.</p>
<p>Question 3: Do you consider there are additional sources of information we should consider when undertaking our assessment of these areas?</p>	<p>Confidential? – N</p> <p>We would welcome the opportunity to further inform Ofcom of our experience in facilitating access to the ADR schemes and how the schemes are operating in practice by way of an information request in which we would be happy to provide examples of cases to help Ofcom assess the effectiveness, fairness and consistency of decision-making within the schemes.</p>

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