
From: do_not_reply@squiz.net
Sent: 03 March 2017 20:23
To: Selene Rosso
Subject: EXTERNAL: Consultation response: Review of the General Conditions of Entitlement
Consultation on the general conditions relating to consumer protection

Response:

Your details

Full name: Gina Antczak
Representing: Individual
Contact phone number: [REDACTED]
Organisation (Optional): [REDACTED]
Email address: [REDACTED]

Confirmation:

I confirm that the correspondence supplied with this form is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified below, and I authorise Ofcom to make use of the information in this response to meet its legal requirements.

Confidentiality

We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (Optional):

None

If you want part of your response kept confidential, which parts? (Optional):

Confidential Responses Only:

(Confidential Responses Only) Please TICK to allow Ofcom to publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)

Ofcom may publish non-confidential responses on receipt:

Ofcom may publish non-confidential responses on receipt

Your response

Question 1: Do you agree with our overall approach to this review of the general conditions as set out in sections 2 and 3 of this consultation? Please give reasons for your views.:

Yes, I agree. Banks do not charge to provide security to protect personal accounts and I think providers of communication services should not charge to protect users from abuse of that service. And that they should take all possible measures to prevent such abuse.

Question 2: Do you agree with our proposed implementation period for the revised general conditions of 3 to 6 months following publication of our final statement? If you think a longer implementation period is necessary, please explain why, giving reasons for your views.:

I do not know how long it should take for the implementation of the revised conditions but it should be done as soon as technically possible.

Question 3: Do you agree with our proposals in relation to contract requirements? If you consider that we should retain the regime applying to contracts concluded before 26 May 2011, please explain why, giving reasons for your views.:

No comment

Question 4: Are there any other modifications to the proposed revised condition in relation to contracts requirements that you consider would be appropriate?:

No comment

Question 5: Do you agree with our proposals in relation to information publication and transparency requirements, including removing the separate condition relating to publication of quality of service information?:

Yes, far too often, costs services are advertised without providing the full picture, for example, the full cost after a reduced cost introductory period, or the cost including line rentals. And there are often so many options that it can be confusing. When advertising any services, a full list of transparent and clearset out pricing should be provided or at least a link to where that information could be found.

Question 6: Do you agree with our proposal to replace the existing detailed requirements in relation to small businesses with a general obligation to ensure price transparency and to notify small business customers where the terms and conditions that apply to them differ from those that providers are required to comply with in relation to consumers?:

No comment - not a business user.

Question 7: Are there any other modifications to the conditions relating to information publication and transparency requirements that you consider would be appropriate?:

Yes, upload as well as download speeds should be specified in the advertising of broadband services.

Question 8: Do you agree with our proposals for updating the current conditions that relate to billing? In particular, do you agree with our proposals to extend the current protections for end-users in relation to billing so that they would apply, more generally, to fixed and mobile voice call and data services?:

Yes.

Question 9: Do you agree with our provisional assessment that our proposals to extend the regulatory requirements for billing to fixed and mobile voice call and data services does not impose a disproportionate burden on industry? Do you have any further information on the likely costs of these proposals?:

Yes.

Question 10: Are there any other modifications to the billing conditions that you consider would be appropriate?:

No comment.

Question 11: Do you consider that our proposed revised condition for complaints handling and access to alternative dispute resolution, together with our proposed revised code of practice on complaints handling, will improve the

No comment.

transparency, accessibility and effectiveness of communications providers' complaints handling procedures, and improve access to alternative dispute resolution? If not, please give reasons, including alternative suggestions.:

Question 12: Do you have any other comments on our proposals in relation to complaints handling and access to alternative dispute resolution?: No.

Question 13: Do you agree with our proposals in relation to the codes of practice that communications providers are currently required to establish, maintain and comply with – including replacing these with direct obligations to make information available, where appropriate?: Yes.

Question 14: Do you agree with our proposals to introduce a new requirement for communications providers to take account of, and have procedures to meet, the needs of consumers whose circumstances may make them vulnerable?: Yes.

Question 15: Do you agree with our proposals to update regulation by extending the current protections for end-users with disabilities, which currently apply only in relation to telephony services, to cover all public electronic communications services?: Yes.

Question 16: Are there any other modifications to the proposed revised condition on measures to meet the needs of vulnerable consumers and end-users with disabilities that you consider would be appropriate?: No comment.

Question 17: Do you agree with our proposal to remove the condition relating to the provision of tone-dialling? Please give reasons for your views.: No comment.

Question 18: Do you agree with the changes we are proposing to make in relation to the provision of calling line identification facilities, including the new requirements we are proposing to add? Please give reasons for your views.:

Yes. I agree with all the views and proposals provided by True call for the reasons set out in my reply to Q1 above and because the increasing number of nuisance calls effectively turns communication services into a bad ones. Over and above suggestions made by True Call, I think all calls made from those numbers which cannot be identified as proper numbers (or where a call back would not be able to be made to those numbers) should be prevented from being connected. Some days, my True Call system registers over five calls with fake-looking numbers generated by a computer calling.

Question 19: Do you have any comments on our proposals in relation to the proposed revised general condition on switching?: No comment.

Question 20: Do you agree with our proposal to remove the current provision which expressly prohibits so-called 'reactive save' activity (in GC 22.15)?:

Yes.

Question 21: Do you agree with our proposal to replace the current mis-selling provisions with rules that focus on the information that communications providers give to customers when selling or marketing fixed-line or mobile communications services? Please give reasons for your views.:

No comment.

Question 22: Do you have any comments on the consequential changes we are proposing to make to the national telephone numbering plan, the premium rate services condition or the metering and billing direction?:

Yes. When any of the premium calls are dialled, an automatic recoding should be made to the caller before the call is connected to tell the caller the cost per minute any any connection charge of the call being made.

Question 23: Do you have any comments on our equality impact assessment?:

No comment.

Question 24: Do you have any other comments on the matters raised by this consultation?:

Yes. Charges in these rural areas where broadband speeds are still low (both upload and download), the charges to the users should be reduced proportionately. For example, if a CP advertises the communications package as delivering up to 7mbs, then those customers who can receive no more than 5 mbs should be charged only 5/7ths of the cost broadband cost.