
From: do_not_reply@squiz.net
Sent: 21 February 2017 10:29
To: Robert Wells
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: Richard Lucas
- Representing: Individual
- Contact phone number: [REDACTED]
- Organisation (Optional): •
- 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: •
- 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.: No view; response only to question 18.
- 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.:

- 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.:
- Question 4: Are there any other modifications to the proposed revised condition in relation to contracts requirements that you consider would be appropriate?:
- 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?:
- 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?:
- Question 7: Are there any other modifications to the conditions relating to information publication and transparency requirements that you consider would be appropriate?:
- 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?:
- 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?:

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

- 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.:

In principle I agree with the proposal relating to caller identification. I would, however, urge that this be made free at the point of delivery. Mobile phones come equipped with caller identification at no additional charge to the consumer whereas BT and Virgin (possibly other providers also) make a monthly charge. It should also be possible for the providers to link these numbers to a database and display the name of the calling company - it is not always possible to identify from a number whether the call is valid or from a nuisance caller.

- Question 19: Do you have any comments on our proposals in relation to the proposed revised general condition on switching?:
- 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)?:
- 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.:
- 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?:
- Question 23: Do you have any comments on our equality impact assessment?:
- Question 24: Do you have any other comments on the matters raised by this consultation?: