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**From:** do\_not\_reply@squiz.net  
**Sent:** 24 February 2017 14:49  
**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: Trevor Williams

Representing: Individual

Contact phone number: [REDACTED]

Organisation (Optional):

Email address: [REDACTED]

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.

Confirmation:

**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):

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**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

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.: Yes

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 Yes

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?: no

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

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?: yes

Question 7: Are there any other modifications to the conditions relating to information publication and transparency requirements that you consider would be appropriate?: no

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?: Caller ID should be a basic facility and not charged for by telephone providers.

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.: yes

Question 12: Do you have any other comments on our proposals in relation to complaints no

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?: 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

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.: yes

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.:

Calling line identification should be provided to consumers free by default. All phone service providers should block calls that are perceived to have spoofed the caller identification, such as a call claiming to be from a land line received from a mobile network or vice versa. Companies should be obliged to register so that consumers can verify the identity of call initiators. Marketing companies from outside the UK should be obliged to register on the UK registry so that consumers can verify their identity and calls blocked by telecom providers for numbers not so registered.

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

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?: no comment

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?: no comment