

In Strictest Confidence

## How companies report the quality of their customer service

Submitted 15<sup>th</sup> June 2009

### COLT response

COLT welcomes Ofcom's plans to withdraw the Topcomm Direction as soon as possible given that the direction does not achieve the policy objectives envisaged when the regulation was introduced.

The response submitted by UKCTA to this consultation is generally supported by COLT and we agree that the scheme suffers from significant deficiencies and represents an unnecessary burden on providers – especially COLT who does not serve residential or small business customers. The information published currently offers little or no value to consumers, and compliance with the direction has been proved to result in considerable costs to the providers involved.

COLT believes that for providers of services Option 3 should apply and the Topcomm Direction should be withdrawn. Should Ofcom determine that a replacement to Topcomm is essential, we would ask Ofcom to ensure the information requirement is applied only to those organisations serving residential customers and small businesses of 10 employees or less. We believe that COLT should not be required to submit information to support such a scheme given our position within the marketplace and our medium and enterprise business customer focus.

COLT agrees with Ofcom that rather than addressing detailed questions surrounding metrics the fundamental questions need to be answered first and it would be highly inappropriate for providers to incur significant expense in modifying the scheme without first having established that it would be beneficial to consumers.

### COLT and Topcomm information

In the UK COLT provides services to medium (100 seats plus) and major enterprise customers across Europe and typically deploys it's own fibre access to connect customers to it's network. COLT specialises in data and managed services and has 18 data centres across Europe. We do not directly serve the residential market or very small business market segments (less than 10 seats). COLT has migrated all of the small business customers it used to serve directly to resellers.

COLT does not provide services based on Local Loop Unbundling (LLU) in the UK. Our focus is very firmly on data and managed services as well as business voice. Our business customers are generally well-informed specialists and experts. We believe there is no requirement amongst the majority of COLT's customer base to make use of Topcomm for Quality of Service information on fixed/mobile voice or broadband services. COLT is already exempt from the provision of complaint data.

We fully recognise the benefits to residential consumers of being able to compare suppliers of mass market broadband and telephony services from a number of perspectives. We believe it is right for Ofcom to further research the information and comparison needs of residential and very small business customers with respect to this. However, COLT does not believe it is fair or appropriate that it should continue to bear the burden and cost of supplying data to the Topcomm site.

COLT proposes that it should cease to provide data for Topcomm analysis with immediate effect given that we do not sell services to the residential and small business markets that Topcomm is targeted at. We appreciate this consultation is limited to consideration of whether the Topcomm direction achieves the original policy aim of providing QoS information in a way that benefits consumers as set out in Ofcom's original statement, but we ask Ofcom to consider our request and COLT's exceptional circumstances.

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