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5 June 2009

Dear John,

### **Quality of Customer Service Review**

KCOM is generally supportive of the need for consumers to be provided with accurate and useful quality of service information. While much focus has been placed on the importance of price in terms of customer perception and choices, the evidence Ofcom has collected from research and calls to its Advisory Service together with feedback from consumer groups, show that the quality of both network performance and customer service are also important to consumers.

KCOM has been a member of Topcomm since its instigation in 2005. We believe that the Topcomm Forum has provided an effective and valuable resource in defining QoS processes and debating QoS issues. It has also shown that CPs can work together successfully in order to address regulatory requirements on a co-operative basis.

However, we agree with Ofcom's assessment that the current Topcomm Direction does not meet the original policy aims. In particular we recognise the issues Ofcom has identified concerning the usefulness of the reported data for consumers, public awareness of the scheme and the costs incurred by providers to comply with the current requirements. We therefore agree with Ofcom's conclusion that continuing with the current scheme is not a sensible alternative.

We also agree that option 2, making amendments to the current scheme (particularly the metrics), does not present a viable solution at this stage. Providers are likely to incur significant costs in redefining the applicable measures and implementing the necessary changes to their systems and reporting processes to meet any new requirements. The danger in doing this is that without further clarification as to consumer demand for QoS information and the particular measures which are of interest, we may well end up with a scheme that shares many of the deficiencies of the current arrangements.

We therefore agree with Ofcom that the sensible course of action at this stage would be to revoke the existing Topcomm Direction. This will ensure that providers are not faced with additional ongoing costs for something which has been recognised as not fit for purpose.

KCOM would however urge Ofcom to give priority to considering possible future QoS reporting requirements. Experience with our own customers shows us that QoS information is of interest and we believe that there will continue to be a need for consumers to be provided with some form



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of comparable information in the future. We note that Ofcom is currently carrying out research to ascertain the level of interest in QoS information and particular areas which concern consumers and we are supportive of this as a first step. We are also happy to offer our assistance to Ofcom in developing the detail of any new scheme should consumer research support a future requirement for QoS information.

Finally, we note that the Topcomm Forum has made Ofcom aware of the timing implications of withdrawal of the Direction in terms of data collation and audit and the cost implications. We appreciate the efforts that Ofcom is making to ensure that these are taken into account in the timetable for concluding this consultation.

Yours sincerely

**Christine Roberts**  
**Regulatory and Interconnect Policy Manager**



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