



## **Quality of Customer Service Review Topcomm Review: Second Consultation**

### **Tiscali UK response**

**11<sup>th</sup> June 2009**

Tiscali is a member of UKCTA and Topcomm and supports the submissions that have been made by both of these groups to Ofcom covering this consultation document.

Tiscali welcomes Ofcom's consultation on the existing Quality of Service direction and agrees that withdrawing the current direction is the best option available given the evidence provided in the consultation.

Tiscali agrees with Ofcom that the existing direction places considerable costs on providers and it does not achieve Ofcom's original policy aim of providing Quality of Service information in a way that benefits consumers.

It is important that Ofcom adheres to its established regulatory principle of being evidence-based and proportionate. Evidence demonstrates that there is no significant benefit to consumers and the costs incurred by providers are disproportionate. Ofcom should therefore proceed with the preferred option and withdraw the direction as soon as possible.

Maintaining or modifying the existing direction without first establishing evidence to support its suitability or benefit to consumers is not appropriate. Ofcom has already highlighted several key deficiencies with the current scheme and it is not clear that modification alone would rectify these enduring problems.

Tiscali supports Ofcom's intention to conduct further research in the area of Quality of Service information to establish whether such information would be of significant benefit to consumers and if so what particular types of information would be most valuable. Once established it is important that Ofcom identifies the most effective format and channel to communicate such information to consumers prior to implementing any future regulatory requirement.