

## Comments:

UniTech has been fulfilling the role of Secretariat for the TopComm Forum since its inception and provided similar services to the predecessor industry group set up for the CPI project. As such we have 10 years experience in working within this type of framework and therefore have an independent and unique insight into the scheme.

UniTech fully understands the reasons behind the stated preferred Option 3 from Ofcom; that the current TopComm scheme is withdrawn. We believe that changes could be made to the scheme so that it better fulfils its objectives for consumers i.e. Option 2. However, being party to the discussions within the group has led us to take the view that a fresh start is probably the best way forward. In our view many of the parties involved have lost faith in the current TopComm scheme and it would be difficult to alter this perception through minor modifications alone. We therefore reluctantly agree with Ofcom's stated preferred option to withdraw the TopComm direction ? Option 3.

We would like to offer some input and advice for any future scheme which is based on lessons learned from the current and previous schemes:

- For any scheme to have the support of the industry members, it must be backed up by a clear consumer requirement.
- Ofcom must have a more pivotal role in defining measurement parameters based on their research. Definitions should not be put together by the industry members.
- Ofcom must drive the scheme and ought to chair the industry group.
- Any independent auditor role must be defined and managed by Ofcom and not by the industry members.
- Consumers must be made aware of the output of the scheme and evidence must be available that they are using the information. This responsibility must lie with Ofcom as the industry will never promote a scheme which highlights the presence and performance of competitors.

As well as fulfilling the administration function, UniTech is able to advise upon and provide technical website and software solutions to facilitate any future scheme. We believe this type of group benefits greatly from having the independent administration that a third party Secretariat offers.

Finally, in support of the current scheme, we believe it was a great achievement for such a large number of industry members to collectively agree and produce the current output.

### **Question 1: Do stakeholders agree that withdrawing the Topcomm Direction is the best option available given the evidence provided in the consultation?:**

UniTech supports option 3 - withdraw the current TopComm direction.