

# Consultation questions

## Section 3: Ofcom's strategy for delivering quality of service information

### Question 1:

Do you have any views on Ofcom's proposal to review the existing TopNetUK scheme, which could help inform this piece of work?

Review of the scheme is required, Currently you have all CSPs providing information regardless as to whether they are providing a service to the largest corporate customer or someone with a residential telephone service. The same set of measures are not applicable to all these different companies and all the different consumer bands that exist.

### Question 2:

To what extent would it be useful for consumers to have access to comparative performance information on broadband speed and broadband quality of service?

Information for the domestic consumer to be able to make informed choices is required and valuable. Currently we all know that sites exist that information is recorded on or we go on word of mouth but if the domestic market had a sensible set of measures defined and provided the information was marketed well I would support that

### Question 3:

Do you agree with Ofcom's proposed timetable for phase one of our review of quality of service information?

I agree with a phased approach to consultation where responses are reviewed and opinions taken on board. What I do not understand is why consultations need to have such a long time span

## Section 4: Should the scope of the QoS Direction be amended?

### Question 4:

Should Ofcom require industry to publish QoS information?

For domestic services a QoS direction is valid provided the information required is pertinent and marketed well so the public are aware of it and can retrieve it without issue.

Question 5:

Should Ofcom encourage the development of more or more detailed consumer surveys focusing on customer service?

Question 6:

If we considered it was appropriate to continue requiring industry to collect and publish QoS information, is there any need to amend the existing QoS Direction?

It should exclude business operators and apply to the domestic market only. A business consumer is covered by contracts, SLAs that details fix times and other requirements that business has specified/ negotiated and differing levels of care they can choose to purchase. I do understand there is some justification for information to be published for the small business market but how do you define different levels of business? The scheme could get very complicated and hard to define/ measure and we could be in the same boat with a new scheme becoming ineffective as it has to apply to a very different sets of consumers.

Question 7:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended - how should the information be made available?

Via well marketed websites that have logical meta data attached so that a site ranks highly in search engines.

Partner schemes where links appear on other sites and vice versa.

You can also say that a scheme would not require marketing if information it provided was useful as it would be self promoting.

Question 8:

Would third parties – such as price comparison sites – be interested in collating QoS information?

Question 9:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – what services should be covered?

For the domestic customer there is value in adding QoS info for broadband and mobile services but if this was introduced we would have a bigger Topcomm forum with even more companies with huge differences making all the data collected even more varying, opinions more differing and even less agreement reached. Introducing Broadband and Mobile would require new forums so we would have one Broadband Forum, one Mobile Forum and one Fixed Line forum but then you can ask the question is this a viable solution?

Question 10:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – what type of revenues should the threshold for participation be based on?

If we expanded the scope of the direction to include Broadband and Mobile I think we need to look at raising current thresholds so that we still have enough providers to be comprehensive but we don't have all the smaller providers over burdened as you state to have to provide all these extra stats. NB costs and manpower required from smaller providers who perhaps have one or two people responsible for Topcomm stats and audit process each quarter would be large find this a huge extra resource to manage.

Question 11:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – should we exempt providers with less than a certain number of subscribers from the requirements?

As thresholds would be reviewed if we extended current scope we would also need to look at subscriber levels that were relevant in relation.

Question 12:

How easily could providers assess whether they hit a subscriber threshold?

Question 13:

If we considered it was appropriate to continue requiring providers to publish QoS

information – and that the existing QoS Direction should be amended – what should the relevant turnover threshold be?

## **Section 5: What information should be published?**

Question 14:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – how could the information requirements be defined and measured?

For the domestic consumer price and accurate is the biggest decision factor. They can handle something taking longer to install or perhaps longer to fix than a business that is relying on its phones and internet connections to make money/ communicate to customers. Price should somehow be included then as well. This information is available though on comparison websites as well so can see some overlap here. Billing information is covered in current QoS Direction meaning asking companies that are covered by Metering and Billing certification to ask them for billing via QoS as well is an overlap and waste of resource for these companies

Alternative Networks provide mobile, fixed line and a small amount of broadband we would therefore be required to provide you with all six new proposed parameters if directed and I cannot put an exact figure on how much this would cost but it would be very hard to implement more Topcomm measures into the business.

Question 15:

Should Ofcom remove, keep or replace the existing parameter on service provision?

We need a more meaningful measure than the current Service Provision parameter and the how many days to deliver a service in working days makes more sense.

Question 16:

How much would it cost to introduce and maintain a new parameter on service provision?

Please see question 14 2<sup>nd</sup> para re introducing new parameters for QoS if it was decided to continue measuring business service

Question 17:

As a provider, is data on service provision something you already collect?

Yes

Question 18:

Do you agree with this definition of 'complaint'?

The new definition is more wide ranging than the current definition but none the less still quite woolly. I agree with the separating out of complaints that are about an issue with the service/ billing as oppose to complaints handling process, but I don't think that QoS should require data on how a complaint is handled.

Question 19:

Should Ofcom remove, keep or replace the existing parameter on complaints?

Question 20:

How much would it cost to introduce and maintain a new parameter on resolution of complaints (option 3a)?

Please see question 14 2<sup>nd</sup> para re introducing new parameters for QoS if it was decided to continue measuring business service

Question 21:

How much would it cost to introduce and maintain a new parameter on total number of complaints (option 3b)?

Please see question 14 2<sup>nd</sup> para re introducing new parameters for QoS if it was decided to continue measuring business service

Question 22:

If a new parameters on total complaints per thousand customers was introduced (option 3b), should customers taking multiple services count as multiple customers?

No

Question 23:

If new parameters were introduced, is there a case for requiring complaints data to be published separately for fixed voice, mobile and broadband services?

Yes – if these new areas were introduced they need to be separated. A mobile complaint and how it is resolved compared to a internet complaint for example is very different and as a result incur different fix times and solutions – they are non comparable

Question 24:

As a provider, is data on complaints something you already collect?

Yes

Question 25:

How could we ensure complaints were being recorded in an accurate and comparable way, and how could we avoid the potential for gaming by providers?

Question 26:

Should Ofcom remove or replace the existing parameter on complaints about faults?

Question 27:

If we introduced a new parameter, should it be limited to broadband providers?

Question 28:

How much would it cost to introduce and maintain a new parameter on complaints about faults?

Question 29:

As a provider, is data on complaints about faults something you already collect?

Question 30:

Should Ofcom remove or replace the existing parameter on how long it takes to repair a fault?

Question 31:

How much would it cost to introduce and maintain a new parameter on how long it takes to repair a fault?

Question 32:

As a provider, is data on how long it takes to repair a fault something you already collect?

Question 33:

Should Ofcom remove or keep the existing parameter on billing accuracy complaints?

Question 34:

How much would it cost to providers not currently part of the TopComm Forum to introduce and maintain the existing parameter on billing accuracy complaints?

Question 35:

As a provider, is data on billing accuracy complaints something you already collect?

Question 36:

Should Ofcom introduce a new parameter on the time it takes to answer a consumer's call?

Question 37:

How much would it cost to introduce and maintain a new parameter on the time it takes to answer a consumer's call?



Question 38:

As a provider, do you already have in place systems that capture the time it takes for your customer service agents to answer a customer's call?

Question 39:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – should providers be required to publish QoS information on bundles?

Question 40:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – who should QoS information be provided for? Should this include large business consumers?

Question 41:

What evidence do you have that small and large businesses would / would not benefit from QoS information?

Question 42:

Would information on one or more particular services be more or less valuable for different sizes of businesses?

Question 43:

Could reporting information for small and large businesses together be misleading?

Question 44:

How could Ofcom distinguish between small and large businesses?

Question 45:

How easy would a threshold based on the Communications Act definition be to implement and how much would it cost?

Question 46:

How easy would a threshold based on a business customer's annual communications spend be to implement and how much would it cost?

Question 47:

How easy would a threshold based on whether a business had a bespoke service level agreement in place with its provider be to implement and how much would it cost?

## **Section 6: How should the information be verified?**

Question 48:

As a provider, do you internally audit information on quality of service? What data do you audit and how much does this cost?

Question 49:

If a member of the TopComm scheme, did you internally audit information on quality of service prior to the imposition of the scheme and what, if any, additional auditing costs did you incur as a result of the scheme?

Question 50:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – should Ofcom determine the verification process or leave it to providers?

Question 51:

Should any verification process include either an internal or independent audit, or both?

Question 52:

If we considered it was appropriate for data to be audited internally, should internal auditors be required to possess a recognised qualification?

Question 53:

What would be an appropriate qualification for internal auditors?

Question 54:

Should internal auditors have to pass a test on the regime and, if so, who should administer it?

Question 55:

If we considered it was appropriate for data to be audited internally, how often should internal audits take place?

Question 56:

If we considered it was appropriate for data to be audited independently, how often should independent audits take place?

Question 57:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – how frequently should data be submitted for publication?

Question 58:

How long a period would be required between the end of the data collection period and the publication of information?

Question 59:

What would be an appropriate sample size in order to ensure that information is robust?

Question 60:

As a provider please could you provide information on;  
the number of stages involved in each QoS event set out in section 5;  
the number of sites (locations) associated with each QoS event;  
the percentage of QoS events located at each site; and  
the number/percentage of sites based overseas

Question 61:

How many site visits do you consider appropriate and why?

Question 62:

If we considered it was appropriate to audit the data internally what measures should an internal auditor take to verify the QoS information?

Question 63:

If we considered it was appropriate to audit the data independently, what measures should an independent auditor take to verify QoS information?

Question 64:

To what extent should Ofcom specify how audits should be carried out?

Question 65:

If we considered it was appropriate to audit the data internally and independently, should we amend the existing Direction to make the verification process more robust?

Question 66:

Would there be scope to reduce the cost of site visits if providers used the same independent auditor?

Question 67:

What would be the cost of an internal auditor visiting all sites over a period of a year?

Question 68:

If we considered it was appropriate to audit the data independently, how should any independent auditor(s) be appointed?

Question 69:

If we considered it was appropriate to audit the data independently, should providers all appoint the same independent auditor?

## **Section 7: Publication of the information and promoting awareness**



Question 70:

If they published QoS information, should providers publish trend data?

Question 71:

How could the information be made accessible to all consumers, in particular disabled consumers and consumers without Internet access?

Question 72:

Should providers be required to provide a link to the specified website on their websites? Where should the link appear and what should it say?

Question 73:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – what should be done to promote awareness of the scheme and improve usage of the information?

Question 74:

If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – is ‘TopComm’ the right name under which to publish the information or should alternatives be considered?