



8<sup>th</sup> October 2008

**BT'S RESPONSE TO OFCOM'S  
CONSULTATION:  
Review of Quality of Service Information  
Phase 1: Information on Quality of Customer  
Service**

Please address any queries on this response to: [deirdre.cheek@bt.com](mailto:deirdre.cheek@bt.com)

## Introduction and summary of BT's views

BT welcomes the opportunity to comment on this subject, having been an active participant in the existing Topcomm scheme and in previous similar schemes for several years.

We completely support the view that consumers should be able to make fully-informed decisions when comparing and choosing communications providers, and for this reason we believe that a review of the current scheme is well overdue, since it is not fit for purpose in a number of respects. It is vital that, for a comparison scheme to work effectively, consumers are able to compare like-with-like in a manner which is guaranteed to be accurate and which cannot be misleading in any way, and in BT's view the current scheme does not meet those aims, for reasons discussed more fully below. In particular:

- The current measures have not been researched with consumers to determine whether they properly reflect consumers' interests and concerns when choosing a provider
- The definitions of each of the current parameters are open to interpretation and therefore do not present comparable data
- Different types of providers are compared side-by-side without proper explanation, again leading to a potentially misleading impression
- Business measures are provided on an averaged basis, with no attempt to differentiate between large corporates and small SMEs, or to ascertain what customers want, with the result that the information is fairly meaningless
- There are differing levels of verification and auditing of data, so that some providers' data are more reliable than others
- There is no publicity of the scheme, and hence very low usage and no consumer benefit currently deriving from it, so all the cost and resource are currently wasted
- It is very difficult to reach a consensus on anything within the Topcomm forum, due to conflicting commercial views, and hence any improvements in any of these respects are almost impossible to agree and implement.

Whilst Ofcom has recognised many of these issues, BT believes that before going any further with its review, Ofcom should complete more comprehensive, quantitative market research into what consumers and business customers really want and need. For example, are consumers more interested in personal recommendations, experiences and satisfaction levels of other consumers, or do they want hard objective data based on averages and/or samples? Do businesses want objective data on quality of customer service, or are their decisions based rather on the packages, discounts and value-added services that suppliers offer them according to their line of business (as BT believes)? Do customers want quality of customer service data displayed alongside price, so that they can readily see the trade-off between one and the other? Given the existing high levels of churn within fixed telephony, mobile and broadband already, is there really evidence of strong enough demand from consumers for more quality of service data to help them make switching decisions, to justify the costs to industry of collection, auditing and publication, or do they feel adequately-informed already on factors of importance to them?

Until Ofcom has answers on these fundamental questions, BT believes it is too early to be discussing any extension of the current scheme to other services, or the detail regarding the measures, or the way in which data should be audited and published.

However in the spirit of co-operation, we have given BT's current views on the detailed questions raised by Ofcom as best we can in the remainder of this response.

## **Detailed responses to consultation questions**

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?**

The mobility market is highly competitive, and churn between network providers is high. Consumers do not appear to be deterred from switching due to a lack of available information. BT believes that any review of the TopNetUK scheme would need to look first at the value-add that the scheme gives to consumers and the awareness and interest that there is in any such scheme or changes to it.

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?**

Consumers already have access to a wide range of information relating to broadband services and this will increase further as ISPs meet the requirements of the Broadband Speed Code of Practice. We believe that there will be huge practical difficulties in trying to compare different ISPs when there are so many service-affecting factors outside the ISPs' control, and therefore that this is unlikely to result in information that is useful to customers or that accurately reflects ISPs' performance.

Question 3:

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

BT agrees with the proposed timetable for Phase One of this review.

Question 4:

**Should Ofcom require industry to publish QoS information?**

Whilst BT agrees that markets work best when consumers are fully informed about what they are buying, there is no evidence that competition is being dampened by customers being reluctant to switch. It is clear from BT's own research that price is by far the most dominant factor in customers' decisions to switch, and it is important that sufficient quantitative consumer research is undertaken before imposing any new obligations on CPs regarding comparable quality of service reporting, when consumers might not benefit sufficiently to justify the cost.

If sufficient demand and consumer benefit can be established, and the decision is taken that industry should continue to be required to publish QoS information, then Ofcom should ensure that the publication of information is both transparent and accurate. It is vital that communication providers are compared on a 'like for like' basis, otherwise the information will be inaccurate and even misleading.

Question 5:

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

BT can see the benefits of encouraging independent consumer surveys on quality of service actually experienced by customers and their levels of satisfaction. These enable consumers to examine a CP's performance on whichever aspect of service is particularly important to them (whether that is provision time, time to answer calls into call centres, complaint handling, billing choices, availability of value-added services or a huge range of other factors), rather than being limited to the factors dictated by Ofcom or industry.

However such surveys will always be subjective and may not be sufficiently comprehensive or accurate to give consumers a balanced, reliable view. Further research is needed into what consumers actually want, and how this could best be achieved. Ofcom would need to ensure that any customer survey that it promotes to consumers contains an accurate, like for like comparison of CPs with no bias towards or against particular industry players. At the same time, surveys should be as simple and straightforward as possible to ensure maximum benefit to the consumer. Funding of surveys would need to be considered and addressed, given the need to ensure an unbiased view.

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?**

If it is decided that industry still has to collect and publish QoS information (which should not be decided until there is sufficient evidence of consumer demand and benefit), there would be a need to make changes to the existing QoS Direction in a number of respects.

The threshold level of £16m in net revenues a year should be kept the same, or lowered, to ensure that consumers are able to choose between a representative and wide enough range of CPs. Increasing the threshold would result in fewer CPs inputting into the scheme and thus less information available to consumers to allow them to make informed decisions.

Most importantly, the measures themselves need to be re-examined and new ones chosen according to the factors shown by consumer research to be the ones of most importance and value to consumers when choosing a CP.

As discussed later in the consultation BT also believes that the extent of business involvement needs to be examined. In addition to the information being provided in Braille and large print, it would be of benefit to produce an audio version of the results in the same way BT does for telephone bills.

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?**

It would appear to make most sense for Ofcom to specify a particular website on which CPs would be required to publish their data, since this would create a one-stop-shop and enable CPs to continue to have some say over how their data is presented (subject to getting agreement from all CPs, which is often extremely

difficult to achieve). However it is difficult to see how, in doing so, Ofcom would be able to prevent the existence of multiple separate independent websites run by third parties (independent price comparison providers, consumer organisations etc) who might choose to publish the same – or different – data. There are many arguments in favour of having price comparison data alongside QoS data, to enable easier comparison of CPs from a single source, and there is of course a very dynamic market for the provision of comparison websites. Specifying a particular website for publication of industry QoS data would not prevent this market from flourishing.

Question 8:

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

This question would be best answered by those third parties, but would probably depend on whether research shows that there is sufficient consumer demand for, and benefit from, such information, and therefore whether those third parties believe that the inclusion of this data would make their sites more attractive. It would seem likely that consumers would find it useful to have QoS data displayed alongside price comparison data in one place, to enable them to decide on the extent to which they may want to trade off between the two; however further research is required on this point.

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?**

BT agrees that, in principle, consumers are likely to benefit from access to objective and comparable QoS information on a wider range of communications services, particularly since increasingly communications services are purchased in bundles rather than individually from separate suppliers. However any requirement to introduce new measures for broadband and mobile services would be costly, as Ofcom has recognised, and BT would want to see further evidence of consumer demand and benefit before any such costs are imposed. Moreover there would be lots of difficulties in agreeing a set of comparable measures for broadband and mobile QoS which are meaningful, allow fair like-for-like comparison and which are easily measurable and auditable. More consumer research would be needed on exactly which factors of service consumers would find most useful to be measured.

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?**

BT agrees that a threshold based on relevant turnover rather than net revenues would be more straightforward and make it easier to identify which providers are caught. However we believe that this change should only be made if there is no impact on the overall numbers of fixed telephony providers qualifying.

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?**

BT agrees that providers with less than a certain number of customers for the relevant services should be excluded, as long as this does not result in a material reduction compared to the current Topcomm membership, which would be detrimental to consumer choice.

Question 12:

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

BT Retail is aware of how many subscribers it has and would be able to assess this. Presumably, as with any threshold, there would need to be some flexibility – or a snapshot approach adopted – so that providers do not move in and out of the scheme more than, say, once a year and there is some certainty and consistency (both for consumers and CPs) as to which providers participate. The appropriate threshold(s) would also need to be reassessed on a regular basis.

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?**

BT has no strong views on this question – but please see comments in response to question 12. It is already extremely hard in the existing Topcomm forum to arrive at a consensus, and of course this difficulty would increase if there were more members. However it is important not to compromise on the availability of comprehensive comparable market data.

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?**

It is currently extremely difficult to achieve consensus amongst providers. BT has long been unhappy with the existing set of measures as we believe that they do not adequately compare like-with-like, and they have the potential to mislead consumers; but we have been unable to get any significant changes made. We do not therefore believe that option 1 (“no change” – i.e. providers draft and maintain detailed definitions) is acceptable. It would be better for Ofcom to be involved in setting transparent and enforceable measures and definitions; however in doing so, consideration should be given not only to providers’ views (taking into account costs involved) but also to consumers’ views on what factors are most important to them when assessing quality of service. As stated above, more research is required on this.

Question 15:

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

More consumer research is required on whether this is an important measure for customers. BT would agree that it is an irrelevant measure for mobile services. However it must also be taken into account that provision of service by a fixed telephony provider – such as BT – that supplies completely new lines (involving the supply of completely new wiring to and within the customer’s premises) is very different to provision of service by a calls reseller or by a provider that routinely tells its customers to go to BT for a new line and then switch suppliers once the line is installed. It is essential that consumers are able to compare like-with-like in this

respect, and we therefore disagree with Ofcom that information should be presented “regardless of wholesale structure”.

It is also misleading for consumers that the current results show performance against each supplier’s own target delivery timescales – which vary widely by provider. Thus the current measure is largely meaningless for consumers wishing to compare between providers. The new measure proposed by Ofcom would be fairer in this respect, but would not overcome the first issue raised above.

Question 16:

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

BT believe that to introduce a new parameter on service provision would cost between £3000 and £10000 depending on whether we already report on the specific parameter chosen or would have to implement systemic changes to capture such data.

Question 17:

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

Yes, BT currently measures its speed of service provision.

Question 18:

**Do you agree with this definition of ‘complaint’?**

BT agrees that the current Topcomm measure is not fit for purpose, for the reasons stated by Ofcom, and in particular because it allows providers to count a complaint as “dealt with” even if the consumer is still not happy. BT also agrees that it is important to have a consistent and meaningful definition of “complaint”.

However we strongly believe that this definition should exclude faults. A fault report in itself cannot be properly described as a scenario where individual customers are exposed to harm and detriment. Whilst technical service delivery is a fundamental part of what a consumer purchases, no CP offers a ‘fault-free’ experience. Nor do we believe that any consumer truly considers a fault to be an expression of dissatisfaction in line with the definition used in ISO 10002:2004. The inclusion of fault reports will incorrectly skew a complaint measure, giving a very negative picture of the industry, whilst adding nothing of benefit to consumers.

Question 19:

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

Ofcom should first satisfy itself that speed of dealing with complaints is one of the most important factors for consumers when considering their choice of provider. If it is, the existing parameter should be replaced, for the reasons explained above.

Question 20:

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

BT believe that to introduce a new parameter on resolution of complaints would cost between £3000 - £10000 depending on whether we already report on the specific

parameter chosen or would have to implement systemic changes to capture such data.

Question 21:

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

BT believe that to introduce a new parameter on total number of complaints would cost between £3000 - £10000 depending on whether we already report on the specific parameter chosen or would have to implement systemic changes to capture such data.

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?**

It would seem to be potentially misleading to adopt this approach, if the likelihood, and nature, of complaints is different depending on the service involved. Consumers should always be able to compare like-with-like.

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?**

Ofcom should first research what consumers want in this respect, and whether complaints data would be a parameter that they would choose as being important to them. This should be researched in relation to each service separately, as the answer might be different for each. Subject to the results of this research, and if comparable QoS data for mobile and broadband services are required at all, in principle we believe it would be less potentially misleading to publish complaints data separately for each service, as the volume and nature of complaints is likely to vary by service, and consumers may only be interested in purchasing one service.

Question 24:

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

BT takes pride in the level of customer service it offers its customers and places the resolution of complaints at the centre of its customer service strategy. In order to measure this BT produces data on various aspects of complaints and complaint-handling which are used to both measure our performance over time and to target improvements.

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?**

Adherence to a consistent and agreed definition of "complaint" and effective auditing processes would be essential in this respect.

Question 26:

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



As with all measures, it is essential that Ofcom carries out consumer research to determine what is important to consumers when choosing and comparing providers. The existing measure is, we believe, used inconsistently and should therefore be removed. As with the existing provision measure, fault rates are likely to be different for those providers who just resell calls (where any fault could be claimed to be caused by the network provider and therefore not for them to “count”), compared to those such as BT which deals with faults on an end-to-end basis. Again, it is vital that consumers can compare like-with-like.

Question 27:

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

Given the low incidence of faults on fixed telephony lines, it would seem unlikely that fault rate per line, or reported fault rate per line, is a relevant or important measure to consumers, but this should be verified.

Likewise, BT would agree with Ofcom that fault rate is unlikely to be relevant when comparing mobile providers.

As far as broadband is concerned, there is potential for a measure of fault rate to be misleading, given the wide range of causes of perceived faults (some outside the provider’s control, such as problems associated with the line or with the customer’s equipment or internal wiring, or with contention ratios or with particular websites). There would be a need to explore further how to overcome such issues. In addition broadband ISPs are in the midst of preparations to comply with the new Broadband Speed Code of Practice. An additional level of regulatory monitoring would be costly, unnecessary and unwelcome.

Question 28:

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

BT believe that to introduce a new parameter on faults would cost between £3000 - £10000 depending on whether we already report on the specific parameter chosen or would have to implement systemic changes to capture such data.

Question 29:

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

BT places a great importance on the resilience of its network. In order to continuously improve our performance we capture faults data; however as stated above, BT does not believe that a fault should be defined as a complaint.

Question 30:

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

As Ofcom has recognised, the existing measure relating to fault repair times is completely misleading. This is both because of different service level targets as Ofcom describes, and also because of differences between providers in what is needed in order for them to repair a fault. As above with service provision and fault frequency, fault repair times are likely to be much longer for a company such as BT which runs the network, compared to a reseller of calls which is not responsible for network faults.

BT agrees with Ofcom that given the low incidence of faults on fixed and mobile lines, the exclusion of these services from this measure would seem sensible, subject to the outcome of consumer research on this point.

As far as broadband services are concerned, the same problems discussed in response to question 27 above would apply in relation to fault repair times.

Question 31:

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

BT believe that to introduce a new parameter on how long it takes to repair a fault would cost between £3000 - £10000 depending on whether we already report on the specific parameter chosen or would have to implement systemic changes to capture such data.

Question 32:

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

Yes, BT already measures fault repair times.

Question 33:

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

Billing accuracy is already regulated through General Condition 11, and instances of billing accuracy complaints being upheld are extremely rare, particularly in relation to consumers. As Ofcom has recognised, there are other aspects of QoS that consumers are likely to find more useful when comparing providers, although this should be verified through consumer research. BT agrees with Ofcom that the existing parameter should probably be removed.

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?**

Not applicable to BT.

Question 35:

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

Yes, BT already collects data on billing accuracy.

Question 36:

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

Whilst in principle we agree that this is a measure that consumers would find useful, this should be confirmed by consumer research.

BT has a number of customer service centres which provide different types of customer help lines. Whilst we strive to keep time to answer as low as possible on all lines, clearly this is more critical on some services (such as 999) than others. An average time to answer across all services may be misleading, whereas individual measures for each type of service would be unnecessarily complicated. This issue would need to be addressed before deciding on an appropriate measure.

It is not clear whether Ofcom is proposing that time to answer calls which route to a recorded message or IVR should be included; or whether the length of the recorded message should be added to the time to answer. The latter would be completely unacceptable, as it would completely ignore the consumer benefits (in terms of speed, cost and efficiency) that such systems bring. Further clarity is required here.

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?**

BT believe that to introduce a new parameter on the time it takes to answer a consumer's call would cost between £3000 - £10000 depending on whether we already report on the specific parameter chosen or would have to implement systemic changes to capture such data.

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?**

Yes, we currently measure the time it takes our agents to answer a customer's call in the different channels we operate.

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?**

On some parameters, performance on one service within a bundle might vary considerably from that on another service, and therefore having an aggregate figure would potentially be misleading and somewhat meaningless. As Ofcom has pointed out, bundles very often include another service such as TV, which could change the provider's performance against the measure if included, and if not included could mislead customers – but which could make comparison with other providers' bundles very difficult.

Consumers' views on this should be sought, but BT's initial view is that option 2 would be more sensible and less confusing to consumers.

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?**

As Ofcom has been advised by Topcomm members, large businesses gain no value from the information currently published by Topcomm and on this basis BT believes that QoS information for these customers should not have to be provided as it is a waste of resource to do so. Such customers are likely to base their choice of provider

on very different parameters to those under discussion in this consultation, such as the availability and price of complex communications solutions, as well as individually-negotiated account management standards and service levels.

Given that quality of service standards will vary between different sizes of business, we agree that reporting the information in aggregate for all businesses is likely to be misleading or at best unhelpful. However, as Ofcom has also recognised, splitting out of performance measures according to business size is likely to be costly to implement and may not be justifiable.

Ofcom should confirm this view through customer research.

Question 41:

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

BT believes that large businesses would not benefit from QoS information for the reasons explained in the response to question 40. Where smaller businesses are concerned, further research is needed into what they would find beneficial, but it is BT's belief that many of the arguments applying to large business would also apply to small/medium businesses, since again they are likely to have very different criteria when deciding on a supplier (such as the availability of value-added services specifically developed for their particular industry sector). Very small businesses would be able to base their decision on the information provided for residential customers

Question 42:

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

As discussed above, none of the QoS measures proposed here is likely to be relevant to large businesses, or possibly to smaller businesses (subject to research findings). Very small businesses are likely to have the same interests as residential customers.

Question 43:

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

Yes - given that quality of service standards will vary between different sizes of business, we agree that reporting the information in aggregate for all businesses with averaged results is likely to be misleading or at best unhelpful, as a business of a particular size is unable to ascertain what service level it can expect from any provider.

Question 44:

**How could Ofcom distinguish between small and large businesses?**

BT agrees with Ofcom that it would be extremely difficult to differentiate in performance measures between different sizes of customer based on number of employees, because this is not something that we keep records on, and is something that could change significantly and frequently.

Basing a threshold on a business customer's annual communications spend with a particular provider would not be a reliable distinction either, because there is not

necessarily a direct correlation between size of spend and size of business. Some customers choose to split their spend between two or more providers, for instance, for resilience purposes. As Ofcom has recognised, spend data would be difficult to collect and to use when it comes to QoS measurement, and would (as with employee data) be subject to significant change over time.

A distinction based on whether or not a customer had a bespoke, negotiated service level agreement would not be reliable because different providers will have different thresholds and criteria for whether or not such agreements are made.

Question 45:

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

A threshold based on the Communication Act definition would be difficult to implement, as discussed above, because BT (and other providers) would have to find a reliable source for the data and to keep it updated. BT's systems are not designed to capture such information, and nor are its measurement systems designed to take such a threshold into account. The costs of implementing such changes are unknown at present and any estimate would require specialist systems investigation which in itself would incur a 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?**

As above, BT's measurement systems are not designed to take such a threshold into account when measuring overall performance against a particular parameter. The cost of implementing such a change is unknown at present. No such threshold should be implemented without strong evidence that customers below the threshold would find such QoS data valuable in making a decision on which provider to use.

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?**

As explained above, a distinction based on whether or not a customer had a bespoke, negotiated service level agreement would not be reliable because different providers will have different thresholds and criteria for whether or not such agreements are made. Therefore any comparison of data from different providers would not be comparing like-for-like and a business would not be able to tell whether any one provider's performance could be taken as being at a level that they could expect to receive themselves.

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?**

All elements of the BT quality management system are subject to an extensive regime of internal quality assessments, and a rolling programme of external registration assessments by Lloyds Register Quality Assurance - our ISO9001 certification body. BT's strategy for internal quality assessments is to maximise value-add, and minimise adverse business impact, by focusing on end-to-end process audits. BT also carries out internal audits on the accuracy of its quality of

service data on a regular basis, as required by the Topcomm forum, and all data provided to Topcomm is subject to independent verification. An overall cost is not available.

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?**

No information is available on internal auditing costs prior to implementation of the Topcomm 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?**

Overall, BT believes it is premature to be considering the detail of verification/audit processes, when Ofcom has yet to establish whether there is genuine consumer demand for the continued publication of QoS data, and if so what parameters, in the view of consumers, should be measured and published.

In view of all the disadvantages with the current verification process, correctly identified and described by Ofcom in paragraphs 6.34 to 6.37 of the consultation document, and the lack of consistency, robustness and comparability of data that these lead to, BT believes that the verification process should no longer be left to providers.

Question 51:

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

BT believes that an independent audit is required for the purposes of ensuring that each provider is being compared on a like-for-like basis. On balance, we believe that the potential for duplication and unnecessary costs incurred as a result of a prior internal audit is outweighed by the benefits of cutting down time for the independent auditor and ensuring that data of adequate quality are being submitted. Hence BT would support option 4 – a two stage process – in the event that it is decided to be appropriate, on the basis of evidence from consumer research, to require providers to continue publishing QoS information.

Question 52:

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

Yes. Please see response to Question 53.

Question 53:

**What would be an appropriate qualification for internal auditors?**

BT believes that all audits should be carried out in accordance with the international guidelines for quality and/or environmental management systems auditing (ISO19011), and should be undertaken by auditors who have successfully passed an

IRCA registered ISO9001 Lead Auditor course which our internal BT auditors have undertaken and passed.

Question 54:

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

BT believes that passing a test on the regime should, as now, be a pre-requisite before carrying out an internal audit, and that this should be administered by an independent invigilator in order to ensure that all providers are likely to carry out this work properly and that therefore data will be truly comparable.

Question 55:

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

If data was audited internally BT believes that this should occur once per data submission – currently every six months.

Question 56:

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

If data was audited independently BT believes that this should occur once per data submission – currently every six months.

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?**

In view of the internal costs involved in auditing submissions, we believe data should be submitted once every 6 months.

Question 58:

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

BT believes a period of 3 months is the most suitable period of time between the end of the data collection period and the publication of information. However this is dependent on whether Ofcom decides that the data should be independently verified before publication which could increase lead times, depending on the resource available.

Question 59:

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

BT currently uses a sample of 100 events per customer type, 1000 in total per quarter.

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**

For each of the QoS measures the following stages occur. The auditors assess the systems and processes used to collect the data, they then extract the data, transport it using our Management Information System (MIS) reports then collate and evaluate the data. This is to ensure it is consistent with the measures definitions. Our processes are generic across all sites.

For each of the five QoS measures here are the number of sites involved:

- Complaints - 5 UK sites
- Billing Accuracy - 16 UK sites and 2 overseas sites (India)
- Reported Faults - 17 UK sites, 6 UK outsourced sites, 5 overseas sites (4 in India & 1 in Ireland)
- Service Restoration - 17 UK sites, 6 UK outsourced sites, 5 overseas sites (4 in India & 1 in Ireland)
- Service Provision - 19 UK sites, 2 overseas sites (India)

Question 61:

**How many site visits do you consider appropriate and why?**

An annual visit to all sites would be very costly and would, in BT's case, add nothing to the robustness of our submission. We believe it is appropriate to visit at least one site dealing with each QoS event every six months. Visiting several sites dealing with the same event would unnecessarily duplicate effort and cost, as our processes are identical for all sites. Adherence to those processes is delivered through our "business as usual" quality checks.

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?**

BT believes that the auditor should assess the systems and processes used to collect, extract, transport, collate and evaluate the data - to ensure it is consistent with the measures definitions, and to ensure that the service provider is not claiming successes falsely. This should include the qualification, training and development of all people involved in the management and operation of these systems and processes.

Question 63:

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

BT believes that it is appropriate for the data collection to be independently audited - and this should be undertaken by a sample assessment of the systems and processes involved. In BT's case, data collection is not site-dependent and therefore there is no need to visit sites. The data collection group should be audited twice per year.

Question 64:

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



BT believes that Ofcom, as final arbiters of the Scheme, should specify how and when audits are undertaken. This will ensure that all providers' data are accurate and a like-for-like comparison can be made. However this does not necessarily mean that all sites would have to be visited – universal and enforced visits by an independent auditor are unlikely to be justified as long as providers can demonstrate adherence to processes.

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?**

BT believes that in order for customers to have the confidence when they compare each communication provider, Ofcom must amend the existing direction so that the verification process is more robust. This will ensure that all the information on the Topcomm website provides an accurate reflection of performance and comparisons can be made on a like-for-like basis.

Question 66:

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

BT agrees that the cost of site visits could be reduced if the status quo remains in that all providers use the same independent auditor.

Question 67:

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

[Response confidential]

Question 68:

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

BT believes that, in the event that it was considered appropriate to continue requiring industry to collect and publish QoS information, the current scheme whereby the Topcomm forum appoints the independent auditor should remain, so that a consistent approach is achieved and there is confidence that like-for-like comparisons can be made.

Question 69:

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

In order for an element of consistency to exist and to ensure that all providers are compared on a like for like basis, providers should all appoint the same independent auditor.

Question 70:

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

BT would support the inclusion of trend data providing this could be done easily and at no extra cost. This data is already available on the Topcomm website and therefore could easily be displayed in graphical format.

Question 71:

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

Topcomm could expand the media through which it publishes its data to include an audio version as well as publication in Braille and large print. Those customers who have no access to the internet within their own homes can generally view the website at their local library. Consumer organisations such as the Citizens Advice Bureaux could be encouraged to allow free access at their sites.

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?**

BT previously complied with the CPI scheme and provided a link from [www.bt.com](http://www.bt.com) to the CPI results page. Within its website BT has a section dedicated to Quality where the Topcomm link could appear. However, we believe it is premature to be considering the detail of publicity methods when Ofcom is still awaiting confirmation that there would be consumer demand/benefit as a result of continuation of the obligation on providers to publish QoS data, rather than relying on existing customer satisfaction surveys.

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?**

Whilst all of the options suggested by Ofcom for publicising Topcomm are possibilities, BT believes it is very premature to be considering publicity when Ofcom has yet to establish definitive evidence that there is genuine consumer demand for an independent QoS website, or what measures consumers would require such a site to display. The market for comparison sites is already crowded and for a site such as Topcomm to be “heard above the noise”, it would require considerable investment in publicity. Ofcom does not appear to have considered how such publicity costs would be funded, and this would be a key consideration for BT and other providers, particularly in the current environment. We would not be prepared to invest in publicity until we were satisfied that there is sufficient consumer demand for such a site, that the measures displayed are the right ones according to consumers, and that the information provided by all CPs is robust, accurate and truly compares like-with-like.

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?**

It is premature to consider this question when so many more fundamental questions about the value of publishing comparable QoS data at all have yet to be answered.