

Lucy Wicksteed
Floor 6
Strategy & Market developments
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

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Dear Lucy

Review of quality of service information

This response has been prepared on behalf of the Fixed Service Providers group of the Federation of Communications Services, which represents more than 130 communications providers (CPs) and resellers of fixed telephony services including Wholesale Line Rental (WLR), calls packages and broadband. A list of our members can be found on the FCS website- www.fcs.org.uk

We welcome Ofcom's review of quality of service information and the opportunity to respond to this consultation as we believe that the scheme in its current form is failing to deliver any significant benefit to customers.

We have not provided detailed responses to the consultation questions as these require the provision of operational information to which FCS does not have access. However, we would like to make the following points on the high level principles:

We do not believe that the current scheme is proportionate in that it is not being used to any significant degree by either residential or business customers. Industry has invested heavily in providing information which has provided very little value to customers in either area.

As Ofcom's own research demonstrates, residential customers are more interested in relative price when making purchasing decisions and there is little value in this type of high level QoS information for business customers, who are generally able to negotiate service levels and compensation to meet their needs directly with their chosen CP. In light of the above it is perhaps not surprising that provision of this type of information does not appear to be attractive to either group.

Federation of Communication Services Ltd

Burnhill Business Centre, Provident House, Burrell Row, Beckenham, Kent BR3 1AT
Tel: 020 8249 6363 **Fax:** 0844 870 5927 **E-mail:** fcs@fcs.org.uk **Web:** www.fcs.org.uk
Registered in England & Wales No: 2749617 VAT Reg No: 611 911 473

We believe that changing the measures and/or the scope of the scheme is unlikely to address this fundamental problem. Indeed, a requirement to change the type of data which CPs are required to collect and submit will inevitably increase the cost to industry with no guarantee of increased take-up by customers and, ultimately, such costs have to be passed on to end-user customers by the communications provider.

Further, we believe that the introduction of additional reporting on, for example, broadband will only serve to bring further complications and to dilute the focus of the scheme. In any case, the broadband speeds experienced by end users are subject to many factors most of which are beyond the control of the communications providers. Publication of average performance in this area is neither helpful to the customer or a meaningful measure of the CP.

In our view, therefore, the requirement to provide quality of service information should be withdrawn until Ofcom can agree a more proportionate approach which provides demonstrable value to customers. We should stress that we believe that it is unlikely that this type of scheme in any form will provide value to businesses and any future initiatives should provide for a separate approach for residential and business customers.

In light of the above we have no views to submit on practicalities such as definitions of the measures, verification methods or on publication and promotion of any revised scheme.

Finally, we do have comments on two specific aspects of the consultation:

On the issue of the participation threshold, we recognize that that there is a danger that moving to a threshold based on relevant turnover instead of the current basis will have the effect of lowering the threshold and bring more CPs into the scope of the requirements. We, therefore strongly agree that any such change should be mitigated by the introduction of an exemption for CPs with a subscriber base below the agreed threshold.

We have also highlighted in previous correspondence with Ofcom that CPs offering services which are based on wholesale services like WLR are wholly dependent on and restricted by the generic levels of service provided by Openreach in, for example, provisioning and fault rectification.

We trust that the above responses are helpful and would be very happy to discuss further the detail of any of the points in our response.

Yours sincerely



Michael Eagle

General Manager