

Response to Ofcom's consultation on quality of service

6 October 2008

Lucy Wicksteed
Ofcom

Dear Lucy

Attached are my responses to those of your 74 questions that I feel able to address, based on my experience over many years of taking part in the industry quality of service indicators initiatives as a "consumer representative". From 1994 to 1997 I represented Oftel's English National Advisory Committee for Telecommunications on the Comparable Performance Indicators forum. More recently, I have input from a consumer viewpoint to TopComm's discussions, partly at Ofcom's request.

You may know that I have a long history of working with consumer organisations on telecoms policy issues, in particular through the Public Utilities Access Forum (<http://www.puaf.org.uk>).

As you would expect, I am strongly in favour of the Direction being renewed and strengthened. I believe that comparable information on quality of service is a basic consumer right that Ofcom needs to guarantee, with cost being a secondary issue (though the costs to the industry are not, in fact, great by reasonable business standards).

None of this response is confidential and you are welcome to use it as you wish. I should be glad to discuss it with you and provide further details if that is helpful.

Yours sincerely

Claire Milne

Antelope Consulting
<http://www.antelope.org.uk>
cbm@antelope.org.uk
020 76 091 092

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?

All the evidence points to customer service aspects needing to be covered for the mobile sector just as much as for the fixed sector, and experience to date suggests that it is unlikely that this voluntary group will provide adequate information without being required to do so.

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?

Many consumers are now making broadband buying decisions and this is probably the area most in need of objective, accurate, comparable quality of service information.

Question 3:

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

It does all seem to be taking a very long time, and the distinction that Ofcom is making between customer service and technical performance is unclear – for example, initial service provision requires both network facilities to be available and service personnel to activate them correctly. However, there is a lot of ground to cover and Ofcom's objective should be to set a realistic timetable and stick to it.

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

Question 4:

Should Ofcom require industry to publish QoS information?

Yes. Consumers are entitled to know what they are paying for before they make a purchase commitment, and plainly full information is not forthcoming on a voluntary basis.

Question 5:

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

Yes, the opinion of other consumers (recorded in an objective, comparable way) is probably the single most valuable measure.

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?

Yes. Apart from adding parameters related to mobile and broadband services, experience has shown that the parameters need to be specified in more detail and more requirements are needed on the manner of their publication.

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?

Discussed below.

Question 8:

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

No comment.

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?

Fixed, mobile, broadband and broadcasting.

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?

No detailed comment on this or questions 11-13. In general terms, the scheme coverage should be as wide as possible without unreasonably burdening small start-ups. Whatever criteria are established should be clear for consumers, and it should be easy for them to find out if a company is not providing information because it does not fulfil the criteria or for some other reason. Also, all providers should be free to join the scheme on a voluntary basis even if they do not satisfy the criteria, so long as their scale of operation is large enough to provide the usual statistical confidence levels.

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?

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?

Experience to date (in which two of the parameters are expressed in terms of percentage achievement of companies' own objectives, rather than in time, and are therefore not comparable) shows that Ofcom needs to be more closely involved in

specifying the parameters. This may be done through putting more detail in the Direction, by Ofcom working more closely with the Forum in future, or (probably best) by a combination of both these approaches.

Question 15:

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

The parameter should be kept, and made meaningful to consumers and comparable by being expressed in terms of elapsed time.

Question 16:

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

No comment on this or other questions addressed to providers.

Question 17: As a provider, is data on service provision something you already collect?

Question 18:

Do you agree with this definition of 'complaint'?

"Expression of dissatisfaction" captures the notion well, but the key question is how the provider (or rather its customer-facing staff) decide whether or not any given interaction amounts to a complaint. Obviously this can be highly subjective, and could reflect more on how polite the customer is than how satisfied, unless a question is included in each interaction on the lines of "do you wish me to categorise this as a query, a request or a complaint?"

Question 19:

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

The parameter should be improved, based on the useful suggestions in the consultative document.

Question 20:

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

Question 21:

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

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?

For the time being, pending truly converged services, "multiple customers" probably represents reality more closely than "single customer" would.

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, clearly, as in spite of bundling many people do still purchase these services separately.

Question 24:

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

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?

This is a job for the comparability auditor, who doubtless already has a checklist of points to look for when checking company practice. Such a checklist could be developed into a standard good practice manual.

Question 26:

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

Particularly if complaints about faults are included in a broader complaints measure, a measure of reliability (up-time) could be more useful.

Question 27:

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

It would be more logical to exempt any service which has exceeded a certain percentage up-time consistently and for long enough. But this surely is something that every responsible provider of any service will want to measure and will be glad to publish if the performance is good – so exemptions seem unnecessary.

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?

Like service provision, this parameter needs to be expressed in terms of time to be meaningful and comparable.

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?

An overall complaints indicator should be broken into components, of which billing accuracy complaints would be one.

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?

This is certainly a matter of significant interest to consumers. "Answer" should not be just when an agent is reached but when the consumer's reason for calling is addressed (by the right agent).

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?

Information on how bundles compare with each other and with their components bought separately could be important but possibly also confusing for consumers. A pilot stage would seem desirable, during which Ofcom gets this information and assesses how big the differences are and, if they are significant, how they could be presented 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?

This response relates to residential consumers only and does not comment on the next series of questions. However, it would seem logical for businesses so large as to negotiate their own quality of service to be excluded.

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?

No detailed comments on this section. As a general principle, Ofcom should be satisfied that the data are reasonably accurate and comparable for the required purpose using whatever means are necessary. Consumers do not as a rule want high precision measurements with several decimal places – a simplified “five star” scale satisfies most requirements – but obviously companies must gain their stars fairly and correctly.

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?

Yes. Displaying any variations over a shorter timeframe (eg a month) also provides valuable information, as do other measures of variability in performance (eg geographical).

Question 71:

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

Ofcom should actively promote coverage of the information by journalists and others who would spread awareness and interest among a much wider audience. These people would naturally use the media and presentations preferred by the groups they are addressing.

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?

Each provider should certainly be required to provide the information on its own performance, in the standard comparable form, on its own website. This is as basic and obvious as providing pricing information. Requiring a link to the comparison website is more controversial, and alternatives such as those discussed under the next question could be tried first.

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?

See answer to question 71 above. Price comparison websites should also be encouraged, and accredited price comparison websites required, at least to link prominently to the QoS information and preferably to integrate QoS information with their price information, enabling consumers to view price and quality together. Ofcom itself could give the information a much higher profile.

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?

The name of this body is of very little relevance to consumers. The important thing is to spread the information around much more widely, for example using ideas generated by this consultation.