Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Review of quality of service information phase 1: Information on quality of customer service

To (Ofcom contact): Lucy Wicksteed

Name of respondent: Paul Scott

Representing (self or organisation/s): TRAQS (TopComm Comparability Auditor)

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☐   Name/contact details/job title ☐

Whole response ☐   Organisation ☐

Part of the response ☑   If there is no separate annex, which parts? **Question 19**

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Name   Paul Scott   Signed (if hard copy)

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?

Our view on the mobile industry is that the current TopNetUK scheme does not sufficiently provide suitable information to enable consumers to make an informed choice about quality of service. We have previously reviewed the TopNetUK website and found the output to be limited and although does provide some indication of coverage, does not clarify any "in-life" scenarios which we consider relevant to a quality of service scheme, for example ease of connection; likelihood of service failures; ease of contacting the provider to discuss issues\changes etc; fault\complaint handling timescales; accuracy of billing. Finally, for any scheme to be comparable it must include all of the main service suppliers.

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?

Our view is that broadband service is now increasingly more common within the household and workplace. There appears to be a high number of broadband suppliers available to choose from but little information indicating the performance of the supplier or product. One difficulty experienced when selecting our own provider was it's comparability to other service providers, and in the end we had to rely on perceived performance\reliability based on the known supplier brand name. We believe it would be extremely useful to provide accurate and comparable performance indicators for both speed and quality of service.

Question 3:
Do you agree with Ofcom's proposed timetable for phase one of our review of quality of service information?

Like many individuals within the industry, we are surprised at the long duration of the proposed timetable, and had expected after such prolonged delays that the current review of the quality of service scheme would be a short affair. However, we appreciate that Ofcom consider this review important and accept the thoroughness required.

Question 4:
Should Ofcom require industry to publish QoS information?

Our considered view is that publishing QoS information is important, not just for consumers, but also for industry to gauge its competitiveness. However, simply by publishing information does not, we believe, fulfil the current schemes obligations in making consumers aware of the quality of service results. Any published information requires active marketing\promotion for it to be considered useful. Without this, we believe the resultant information is only partially of use to those within the industry.

Question 5:
Should Ofcom encourage the development of more or more detailed consumer surveys focusing on customer service?

Our view is that consumer surveys are only relevant in providing subjective views and does not equate to actual "true" quality information, as provided by the current QoS scheme. A QoS consumer survey could not be used for comparability between different service providers, of different product portfolios and service offerings, but can over time provide interesting information on trends within each particular provider\brand.

Consumer surveys are also expensive and from our experience working within the industry, individual service providers may prefer to spend their own marketing budgets on detailed studies, specifically targeted for their individual needs.

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?

From our experience with the current scheme, there are a number of considerations Ofcom may wish to take when amending the existing QoS Direction. Firstly, we believe that the current scheme has been partially successful in bringing together industry service providers and producing accurate and comparable information. Although a website has been produced and results displayed, there has been very little effort in promoting the scheme or making the results publicly aware.

Secondly, it is commonly accepted that the service providers are unlikely to fully support the scheme, unless perhaps they are the best performing supplier. Consequently, many individual forum members have been almost duty bound to destroy the credibility of the scheme at any opportunity and we believe that there has been little enthusiasm in improving the scheme. As an example, some measurements are calculated upon each service provider's own targets\SLA's which are not necessarily made publicly available with the results. These targets can be wildly different, especially in the business sector, and therefore the publicised results are open to misuse or misunderstanding and appear to misrepresent some service providers. Attempts within the forum to neutralise this potential non-comparability and amend the measurements accordingly has been disrupted.

Finally, the restrictions placed on the comparability function, i.e. only able to visit \ observe an accuracy audit once a year (for one day), and only for operational centres based within the UK boundary, we believe to be too constraining.

Therefore, if Ofcom do consider that it is appropriate to continue requiring industry to collect and publish QoS information, we respectfully suggest that the QoS Direction provide (a) clarity on the promotion of the results, (b) amending the measurements to be more comparable & neutral, and (c) review the role of the comparability function to ensure that full visibility of service providers processes, measurements and accuracy audits are maintained.

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?

We believe that the information should me made available in three ways. Firstly, each period of information should be publicised either in the media or news reports to alert consumers that information is available. Secondly, this detailed information should be made available to consumers through a website which is certified by Ofcom. Our reasoning for this is that unless consumers be made aware that this information exists then it is unlikely they will find it (current hits on the TopComm website supports this), and for the results to be given credibility, they need to be supported or endorsed by Ofcom. Finally, we believe that the output of the QoS results should be made available in print format and supplied with issued bills. Service Providers almost always offer extra marketing information within their bill postings, so this would not seem to be different from any current practice. We have also observed recently that British Gas supply a "Standard of Performance" leaflet with their bills, proving that it is feasible to do. This method will also ensure those consumers who do not have internet access, would have access to the output of the scheme.

Question 8:
Would third parties – such as price comparison sites – be interested in collating QoS information?

We would hope so, but expect that one main consideration from price comparison sites is "how much money will they make from supplying this information". If it is well known that Ofcom endorse the results, and consumer demand is high, this might encourage price comparison sites to include the QoS results alongside their own 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?

A service which is common to many industries is "Customer Service", i.e. how does an organisation respond to your needs. We would hope that any future QoS scheme would include customer service measurements combined with any product specific information. With regards to products, the obvious components would be fixed line voice, mobile voice, and broadband. Other data only products\networks\private circuits maybe of some interest to business services, but we would recommend further research by Ofcom if Business services are to be included.

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?

One observation we have made with the current TopComm scheme is that Ofcom have appeared at times unaware as to which providers should or should not be required to participate in the scheme and has at times relied on other sources to identify those providers who are approaching or just exceeding the £4m quarterly net revenue threshold. If, as quoted in the consultation document, service providers are required to report 'relevant turnover' annually to Ofcom, then it would appear that there would be credible evidence to identify which providers meet the threshold. The difficulty which Ofcom may still need to overcome is calculating how much of the "relevant turnover" is related to the products and consumer types being serviced by these providers. For example, if a provider of consumer voice and broadband also supplies a very high valued private circuit service, (where Private Circuits may be not be part of the revised scheme), then the service provider or Ofcom will need to apportion the 'relevant turnover' to only those products which are applicable to the scheme.

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?

We believe that for a scheme to require providers to publish QoS information, it has to be relevant to the high majority of the consumer "End-User" base. Therefore, subscriber numbers are an important consideration, but we also believe that providers who do not meet the finalised threshold should not be excluded from the option of voluntary participation – perhaps at a reduced cost!

Question 12:
How easily could providers assess whether they hit a subscriber threshold?

From our experience this is relatively easy. The mainstream service providers have suitable customer management systems and billing systems which can be interrogated to identify subscriber numbers. These figures tend to be part of senior management scrutiny and we would be extremely surprised if providers were unable to obtain them.

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?

As mentioned earlier, we believe that the high majority of consumer base should be covered by a QoS scheme. However, we also recognise the difficulties in discussing and agreeing decisions with high numbers of forum members. With these points in mind we would suggest that a threshold of £80M may not be comprehensive enough; a £16M threshold would be preferred for significant capture of the market but may prove too difficult in forum member decision making, unless the structure and process for discussion is made more manageable. Therefore, unless this is resolved, we would recommend a threshold of £40M, which we understand would also align to the current metering and billing scheme threshold.

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?

From our experience of the current TopComm scheme, it would not be suitable to promote Option 1, as service providers to date have not recommended, or are unlikely to suggest, any new measurements. From a generalised provider viewpoint, the scheme is not seen as a benefit to them, as not only does it show other service providers who offer the same services, but may also show others who produce better results. Therefore, we recommend Ofcom undertake option 2, whereby the parameters and definitions are specified jointly by Ofcom and stakeholders.

Question 15:
Should Ofcom remove, keep or replace the existing parameter on service provision?

We believe that the provision of services is an integral element of the customer experience with a service provider. The current fixed line voice measurement attempts to identify potential satisfaction with the service provider's ability to meet its provisioning commitments. However, our experience of the current measure is that commitment based measurements can be manipulated, i.e. by stipulating that a commitment is subject to a variety of conditions, or where a commitment is loosely based around a Service Level Agreement of which the parameter may not be visible to the consumer. In reality, if a provisioning measurement is to remain, it must be based around the timescale taken to deliver the working service. From our study, provision of mobile services is usually so quick that it has no consequence to the customer, but provision of fixed line and broadband are likely to show quite a varied set of results.

As to the output of the measurement, we agree that providing the performance on the fastest 95% is a suitable element, but we do not agree that providing the slowest 5% is relevant. To fall into the latter category, these orders are usually subject to system specific issues and do not follow the normal process, as recognised by the vast majority of events. They also tend to range considerably in timescale and in our opinion would not be representative to the service provider's performance.

Question 16:
How much would it cost to introduce and maintain a new parameter on service provision?

Although we would be unable to provide accurate information on cost, we would expect the cost to be less than the current measurement which requires the service provider to record additional information and notes on commitment times and discussions surrounding these. A measurement based on delivery timescales could be more easily and comparably measured from order receipt to order completion. An audit activity to accompany this would need to ensure that all orders are entered on the day of receipt from the customer. Our operational experience with this measurement has found that it is possible to compound and confuse due to the service provider not accepting an order until "all pre-checks" are completed. This would need to be clarified and clearly understood in the definitions to ensure comparability.

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

No Answer Given

Question 18:
Do you agree with this definition of 'complaint'?

Unfortunately no, not in its present format. We are unclear what is being derived under "where a response or resolution is explicitly or implicitly expected". Does this mean that a service provider would only count a complaint where they are expected to respond in writing? From our experience, customers express dissatisfaction in a number of ways, and not all are obvious that a response is required. For example, a common call centre complaint we have witnessed is "about time you answered the phone, I've been waiting to get through for ages". Normal course of action is for the operator to quickly move on to handling the call. In our opinion, this is an expression of dissatisfaction which should be counted as a complaint. Would this example be considered to meet the definition proposed?

Also, we do not agree that all fault reports are complaints. Some observations we have witnessed have indicated that fault calls are not always expressed with dissatisfaction, but are simple enquiries over the condition or performance of the service. With some services, Carrier Pre-Select as an example, where a fault could reside either with the line provider or the routing provider, customers are sometimes requested to check the status of the line or equipment before the service provider will process the fault call. If these are also to be included as complaints, this could misrepresent the service provider if a measure exists where the number of complaints would be compared to the customer base.

Question 19:
Should Ofcom remove, keep or replace the existing parameter on complaints?

From our experience as comparability auditor, we are fortunate enough to see the detail of the number of complaints measured by each service provider, and identify the ratio of complaints to the number of subscribers (bills or lines) with either a residential or business service.

We have observed first hand the training and support in which some service providers equip their customer service staff with, and believe that some companies are more focussed on capturing customer feedback than others.

The numbers of events submitted for comparability review do, in many cases, replicate the emphasis in which some service providers place on capturing this information. Our concern with this style of measurement is that it attempts to penalise any company who places importance on capturing this style of customer feedback. Other less vigilant companies may receive the same number of events, but capture fewer complaints.

The current measurement of calculating the percentage processed over a time period, or even a measurement calculating the average time over a period, is not influenced significantly if a portion of events are not captured. The theory is that those events which are omitted are likely to fall under the same time distribution of events which are captured and measured. It is also likely that the types of events which have not been captured are those which are resolved at the initial point of contact, and so by excluding them only provides an underperformance result (i.e. the service providers do not gain an advantage by not capturing these events).

We believe, having had experience within an operational and customer service environment, that if targeted on the number of complaints meant that the higher the event capture rate, the worse the performance (which may also be performance related to salary), then agents, and managers will naturally be driven to not capture these dissatisfactions as complaints. For audit purposes, it is very difficult to quantify events which have not been captured.

Therefore, we do not agree on the new parameter as mentioned in 3b – total number of complaints per thousand, as we do not believe the results could be proven to be accurate\inaccurate or comparable. However, we do agree with the proposal to measure complaints from all service types (including complaints which are non-service specific), where the performance is based on the average time taken to resolve the complaint. Unfortunately, we cannot agree with the exclusion of complaints processed at the first point of contact. If this was required, then service providers again would be naturally driven to not capture complaints processed at the first point of contact. We can foresee scenarios where customer's complaints would inappropriately not be captured because the service provider may believe that the issues are resolved. Where, in reality the customer would have to repeatedly contact the service provider for the same issue.

In summary, we prefer option 3a, but would suggest that all complaints (i.e. including those processed at the first point of contact) are measured to produce an average resolution time – fastest 95% only.

Question 20:
How much would it cost to introduce and maintain a new parameter on resolution of complaints (option 3a)?

No Answer Given

Question 21:
How much would it cost to introduce and maintain a new parameter on total number of complaints (option 3b)?

No Answer Given

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?

See answer to question 19.

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?

See answer to question 19. We believe that a complaint measure should be aimed at identifying how quickly a service provider can resolve the issue, regardless of the product type or circumstance.

Question 24:
As a provider, is data on complaints something you already collect?

No Answer Given

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?

From our experience on the comparability role, we look at comparing the number of complaints against the number of lines provided (residential), or bills provided (business). The results are aggregated and an industry average produced. From this it can be identified which service providers fall outside the mainstream average. However, this will only indicate which service providers are significantly different, but it will not confirm whether any or all or accurately capturing complaints. To do this, those persons who interface with both the customer and event capturing system must be randomly selected for audit interview which through suitable questioning would provide some assurance to complaint capture. This process would also benefit from occasional call monitoring to help ensure that these agents actually do what they state they do.

Question 26:
Should Ofcom remove or replace the existing parameter on complaints about faults?

From our experience, service failure (fault rates) may be impacted by introducing a new product, new installations (connections) or from a significant major service disruption (outage). We all expect from time to time that something will go wrong with a product or service, and that is why it is important to understand the likelihood or frequency of this happening. From our studies we estimate that fixed line voice services are likely to be disrupted on average once in every eight or nine years, which we do not believe would be a significant factor in choosing a service provider. Therefore, we would not promote reporting on fault rates for this service, but replace the measure with Broadband faults.

Question 27:
If we introduced a new parameter, should it be limited to broadband providers?

Yes, we have some evidence from service providers offering broadband that the fault rates with this product is significantly higher, which compares to that found by JD Power suggesting that reliability is higher driver of dissatisfaction than compared to cost. However, although we have attempted to identify mobile provider fault rates, we have no sufficient evidence to prove significant unreliability warranting a measure for this product.

Question 28:
How much would it cost to introduce and maintain a new parameter on complaints about faults?

No Answer Given

Question 29:
As a provider, is data on complaints about faults something you already collect?

No Answer Given

Question 30:
Should Ofcom remove or replace the existing parameter on how long it takes to repair a fault?

From our position within the industry, and by discussions with some service providers, we believe that consumers are more interested in the time it takes for an issue to be resolved than the fact that the issue has occurred at all. Therefore, we promote any measurement where the time it takes for a service provider to react to a customer issue is concerned. Having experienced the fixed line service restoration measurement through the comparability role, we agree that the measurement based on meeting commitments is flawed and does not show truly comparable performances. We have noticed service providers extending their target times, with disregard to consumer benefit, purely to obtain a satisfactory performance result. Therefore we believe that the measurement should be based upon the average time it takes to restore service for the fastest 95% of events. For the same reason as answered in question 19, we do not believe that displaying the slowest 5% is relevant or would provide a comparable measurement which is beneficial to the consumer.

On the question of products, we believe there is scope for including both fixed line and mobile services, as well as broadband faults, into this measurement for the reason that consumers would be more interested in knowing how a service provider will react to a situation, regardless of how frequent that situation may occur.

Question 31:
How much would it cost to introduce and maintain a new parameter on how long it takes to repair a fault?

No Answer Given

Question 32:
As a provider, is data on how long it takes to repair a fault something you already collect?

No Answer Given

Question 33:
Should Ofcom remove or keep the existing parameter on billing accuracy complaints?

From our role as comparability auditor we have been privileged to witness the actual numbers of complaints measured as "upheld" bill inaccuracy complaints compared to the overall number of complaints processed, for each given quarter. With our operational and call centre experience, we know that billing periods are one of the busiest activities that impact a service provider, and the number of "complaints", or indeed "upheld complaints" is small compared to the number of calls received.

Through discussions and reviews with service providers we have found that generally there is a good understanding by operational staff of the differences between "upheld" and "not upheld". We have also seen that in many cases, systems and processes have been amended to differentiate complaints by both type and outcome.

However, we believe that there is a more fundamental concern with billing practices than simply inaccurate billing. By comparing the ratio of calls received to the number of complaints processed, and then complaints processed to those related to "upheld" bill inaccuracy complaints, we believe that only measuring inaccurate billing is falling short of the reality that many consumers feel compelled to call their provider simply because they do not understand the bill.

Therefore, we promote any measurement which includes billing activities, but believe that Ofcom should expand this requirement to cater for all billing issues, whether they be complaints, enquiries, upheld or not.

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?

No Answer Given

Question 35:
As a provider, is data on billing accuracy complaints something you already collect?

No Answer Given

Question 36:
Should Ofcom introduce a new parameter on the time it takes to answer a consumer's call?

Yes.

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?

This is something which all service providers with an ACD will be able to measure. There may be issues with comparability where providers either have functionality in place for "call backs", i.e. where the consumer does not have to wait for an agent to answer the call, but still has to wait for an agent to return a call; or issues where an IVR is involved in the call tree, and time of routing selection is dependant on both the complexity of the system and the callers ability to navigate it. However, if measuring from the point at which a call is queuing for an agent (i.e. at the ACD), this should be relatively accessible and easy to collate and measure.

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?

No Answer Given

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?

We believe that by providing unbundled information is more relevant to the overall consumer base. This way, the consumer would be able to identify both positive and negative effects for each product, rather than being provided with an "overall" score. However, there are some measurements which are product neutral, i.e. complaint handling (average time to resolve a complaint), or call handling (average time to answer a call). In these circumstances, it is relevant to provide bundled QoS information.

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?

From our position and experience within the industry we do not believe that large business organisations would benefit from QoS information. We know that large businesses generally put contracts out to tender and are subject to bespoke service level agreements, therefore by identifying how service providers manage single platform consumers would be of little interest to large businesses.

We do believe that QoS information is relevant and would be beneficial to both residential and small to medium businesses, which do not have the infrastructure to manage individual bespoke contracts with the service providers. Therefore Option 2 is our preferred solution.

However, one important factor to note if deciding to split the requirement to produce QoS information by service\customer type is that if a threshold is put in place based upon revenue received, this will require further analysis by either the service provider or Ofcom in determining whether some business providers who service both corporate and small businesses meet the threshold relevant to the QoS element. A second factor would be that generally all QoS related events are managed in specifically designed systems, and on the event handling level are unlikely to differentiate between small and large business. Therefore, this will require some extra system or reporting functionality in differentiating events by business type.

Question 41:
What evidence do you have that small and large businesses would / would not benefit from QoS information?

See response to question 40

Question 42:
Would information on one or more particular services be more or less valuable for different sizes of businesses?

No Answer Given

Question 43:
Could reporting information for small and large businesses together be misleading?

See response to question 40

Question 44:
How could Ofcom distinguish between small and large businesses?

From our experience within the industry we have witnessed that service providers generally distinguish their large business contracts based upon the customer spend. For example, if a customer spend is approximated to be around or above £100k per annum, then they are deemed to be a corporate customer. Service providers usually have a flag mechanism within the customer management system, or specific departments\call centres which manage these contracts. Therefore, the customer types can be relatively easy to distinguish. However, as mentioned before, with systems handling events from both corporate and non-corporate businesses, there may be a requirement to include extra functionality for reporting and measurement purposes.

Question 45:
How easy would a threshold based on the Communications Act definition be to implement and how much would it cost?

As per our answer to question 44, if the threshold were to be based upon customer spend of say £100k per annum, we believe that service providers will be able to differentiate and apply measurements accordingly. Having worked within the business industry we know that keeping records of customer employee size is impractical and also would be difficult to prove through auditing and verification. However, customers spend for corporate businesses are usually agreed through contracts, i.e. the service provider will agree to offering certain service level agreements if the customer agrees to spend a minimum level. As this information is therefore available it can be used for both reporting against and threshold and for auditing purposes.

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?

See answer to question 45.

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?

See answer to question 45

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?

No Answer Given

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 Answer Given

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?

Without doubt, Ofcom should determine the verification process. Over the past 3 years we have witnessed that the forum have placed so much restriction on the comparability auditor (i.e. only observing an accuracy audit once per year, only asking questions if the service provider permits this, and only observing functions performed within the UK boundary - no verification of overseas call centres), that the role is unable to confirm that all providers are accurate and comparable, but simply to recognise those which are obviously inaccurate or non-comparable. This, in our view, leaves a risk that some providers may be publishing inaccurate or non-comparable results. Whilst we recognise that Ofcom may not be able to resolve all of the comparability requirements, we believe that a more fair and equal approach to performing the role would be determined by Ofcom's involvement.

Question 51:
Should any verification process include either an internal or independent audit, or both?

From our experience, if the function was left to internal auditors only, the output would be populated with errors, inaccuracies and non-comparability. If the decision is to be influenced by cost, then we would suggest that the scheme would work best with an independent auditor only. However, this may cause some issues with the auditor being able to review all operational and data affecting locations in time for publishing the output. We recognise that this is dependent upon the number of participating providers and then the number, and geographical locations, of the offices to be audited. Therefore, after careful consideration, we believe that the current two stage verification process is the best option.

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. The current scheme requires all auditors to be qualified to ISO:9001 standard. Whilst we recognise that this level of qualification is a good standard, this does not automatically ensure that the auditor will understand and appreciate the operational processes and measurement definitions to be suitably equipped to be able to perform a QoS audit. Therefore, we would recommend that a suitable auditor test is also linked to the required qualification associated with the audit function.

There is an audit test which has been administered for the current TopComm scheme. However, this is an open book test and is performed on-line so there is no real assurance that the participant truly understands the answers to the questions. This simply proves whether or not the participant can obtain the correct answers. From our experience, up to 20% of the "internal" auditors who have passed the test, still are unsuitable to perform a QoS audit. Ideally, the internal auditors should all be assessed through a natural observation of their method of auditing the QoS measurements.

Question 53:
What would be an appropriate qualification for internal auditors?

As per the previous answer, we agree that an ISO:9001 auditor should have the required skills to perform a quality audit, but suggest that a QoS related exam should also be mandatory to the qualification required for this scheme. This exam would need to be created based upon the specific criteria of the measurements, definitions and processes which are to be used. Following the exam, all auditors will be assessed through audit observations.

Question 54:
Should internal auditors have to pass a test on the regime and, if so, who should administer it?

As per the previous answer – yes. We recommend that the comparability auditor administer the test.

Question 55:
If we considered it was appropriate for data to be audited internally, how often should internal audits take place?

We believe that audits should be linked to the output of the published results. For example, if quarterly sets of results are to be published, then the audits need to be performed for each quarter. If six monthly sets of results are to be published, then the audits can be progressed over a six-monthly period, and so on.

However, we do recognise from our experience within the current QoS scheme that the size and scope of the service providers can be significantly different. Whilst some providers operate from a single location, with less than 200 employees, others are global with offices based in many countries, and employ thousands of staff. Therefore, the actual audit requirements of one organisation would be different to another. We have witnessed within the current QoS scheme that providers with offices overseas are reluctant to provide audit assurance of these locations in comparison to those sites based within the UK. Everyone we have discussed this with from the service providers have all confirmed this is cost based. I.e. it is cheaper for an auditor to review the function of a UK office, compared to one based, say in India.

From our perspective, we believe that audits should be conducted to a frequency which is irrelevant to the distance and cost from the UK based consumer, but should be targeted based upon the impact (or potential impact) to the accuracy of the reported results. At minimum, we would recommend that those areas affecting up to 50% of the reported output should be reviewed for each reporting period.

Question 56:
If we considered it was appropriate for data to be audited independently, how often should independent audits take place?

If independent only, then this would be the same answer as to the previous question. However, if this is part of a two stage process, we would recommend that the independent auditor either conducts or observes one provider audit for each reporting period.

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?

From a personal viewpoint, as a consumer, I would like to see the output on a quarterly basis. This would provide an easier assessment of relevant trends and also give me results which are relatively up to date. However, we recommend that Ofcom obtain further consumer evidence to identify consumer needs.

Question 58:
How long a period would be required between the end of the data collection period and the publication of information?

Ideally, this should be a matter of weeks and not months. We believe the current process is too long, but is unfortunately required due to the restrictions on the comparability auditor being unable to frequently witness first hand the detail of the accuracy audits. The current delay in publication is due to the following timescales:

From accuracy audit to data submission	-	6 weeks
From data submission to initial comparability check -		2 weeks (in total for all SP's)
From comparability check to SP response to questions -		4 weeks
From SP response to comparability sign-off	-	2 weeks
From sign-off to upload and final publication check -		2 weeks

We believe that if the comparability role was also involved regularly with the accuracy auditors at the initial review period, that most comparability issues would be resolved at the earliest period, and therefore the following period of 8 weeks checking and signing off the results could at least be halved, permitting a much earlier publication.

Question 59:
What would be an appropriate sample size in order to ensure that information is robust?

From our review with the accuracy auditors at the beginning of the QoS scheme, we recommended a minimum sample size of 100 events per measure. Statistically, this would result in a confidence level that the output of the sample would be representative to around 97% of the population of events. Unfortunately, the forum members believed that the time required to sample 100 events would cost them too much time and therefore money. The forum then dictated that the minimum sample size would be 25 events – this equates to a confidence level that the output of the sample would be representative to around 53% of the population of events (i.e. at least half would be accurate). If the scheme was to be reviewed, we would again recommend a minimum sample size of 100 events per measure.

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

No Answer Given

Question 61:
How many site visits do you consider appropriate and why?

No Answer Given

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?

The current QoS scheme has documented the mandatory requirement for internal auditors, and remains relevant for any audit. The document (TopComm Accuracy Audit Process – Issue 3) states that the auditor must review the following elements:

- People – Those persons who interface with process, systems, customers and data
- Process – the method used to capture, manage and report the customer events and interactions
- Systems – the tools used to capture the details supporting the customer events and interactions
- Documentation – any appropriate evidence which supports the processes used to capture the customer events and interactions
- Publication – an audit trail from data source to data submission for publication
- Improvement activities – an assessment of any corrective action taken against issues from previous audits
- Location – assessments should be made on site where activities occur, where data is collected, analysed and reported.
- Duration – when deciding the appropriate number of audit days, the following factors should be taken into consideration:
  - Number of different product offerings
  - Number of customer management systems
  - Number of locations where activities are based
  - Status of any quality management system which supports the required measurement process
  - Previous audit findings
  - Acquisitions and mergers
  - Events approaching publication thresholds

From the comparability role, we have observed many accuracy audits for the TopComm scheme and have witnessed a tendency for auditors to rely more on data sampling than process interviews. We believe that both are equally important, as it is no good just relying on the output as the input may be flawed. Our approach would require the internal auditor to regularly review the process with the staff that interact with the customer and systems, over a number of different locations (if applicable) to gain a full understanding of how events are recorded through various applicable scenarios. Based upon the output of the process audits, the internal auditor can make an assessment on whether the reports have been collated from the correct data sources, and calculated using the correct algorithms. To support the output, the internal auditor should verify the accuracy of the results by sampling a statistically suitable number of events to confirm that the output is either accurate or inaccurate.

Question 63:
If we considered it was appropriate to audit the data independently, what measures should an independent auditor take to verify QoS information?

As above for question 62. Regardless of whether the internal or independent auditor is used to verify accuracy, the same audit verification would be relevant to either party.

Question 64:
To what extent should Ofcom specify how audits should be carried out?

From our experience we have noted reluctance by service providers to fully audit the data capture and reporting processes, usually due to the alleged "high cost" of doing so. It therefore appears that service providers are more interested in producing results without concern for its accuracy. Over the past three years, it has become increasingly apparent that some service providers are moving their customer management functions to overseas offices, presumably this is partly due to saving costs. Also at this time we have noticed a decline in audit activity. To summarise the issue, the accuracy auditors which I have spoken with about this, within the TopComm environment, have all confirmed that if the offices were all UK based, more resource would be used to confirm the accuracy of the output. However, as office locations are overseas, the accuracy auditors are only permitted to review these locations on an infrequent basis as opposed to a more regular basis.

Therefore, we believe that Ofcom should specify the frequency in which audits are performed, irrespective of where the offices are located.

Our next point covers the independent audit where in the current TopComm scheme a number of "cost saving" restrictions have been placed on the Comparability function. For example, the Comparability Auditor is also not permitted to review any overseas location, and is only permitted to observe 1 accuracy audit per service provider within a twelve month period. We believe that, within reason, the Comparability Auditor's visibility of the service provider's customer management functions should not be restricted.

Finally, as referenced in our answer to question 62, we believe that Ofcom should endorse the mandatory elements of the audit functions.

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?

Yes – Option 2.

Question 66:
Would there be scope to reduce the cost of site visits if providers used the same independent auditor?

We are unsure if this question assumes that it is possible for providers to use different independent auditors. If so, then Ofcom need to ensure that all independent auditors are like minded and agree on the same audit process and definition interpretation. We believe this may cause some difficulty. However, in answer to the question it may be possible to save some cost for an independent auditor to visit sites at a similar location. In practice, during the past three years on the TopComm scheme we have only seen this work in the beginning when the Comparability Auditor had some ownership of the role and could organise and arrange the audit schedule. To make this work, service providers would need to organise some of their internal audits in conjunction with each other. In our view, it is possible but unlikely to work unless the service providers could see benefit from complying with the spirit of the scheme and its output.

Question 67:
What would be the cost of an internal auditor visiting all sites over a period of a year?

No Answer Given

Question 68:
If we considered it was appropriate to audit the data independently, how should any independent auditor(s) be appointed?

The TopComm members collectively recruited and employed the comparability auditor through a series of tests, and interviews. We like to believe that the best applicant was selected for the role based upon experience and benefit to the output of the scheme. We hope that any future scheme would continue to benefit from the experience gained from the current scheme, but also believe that Ofcom should be fully involved in the appointment process to ensure fairness and equality amongst the scheme's membership. Therefore, we believe option 3 is the most appropriate.

Question 69:
If we considered it was appropriate to audit the data independently, should providers all appoint the same independent auditor?

Yes – we believe that if different independent auditors were used for different service providers, the scheme would quickly descend into disagreement and accusation over accuracy and comparability. Therefore, we believe Option 2 is most appropriate.

Question 70:
If they published QoS information, should providers publish trend data?

Personally we like the concept of trend data as it is something we use regularly in our QoS assessments to help identify errors, issues and anomalies within the reported output. If there is consumer demand for it then we believe that the scheme should try and work to provide it. However, one objective concern would be that the cost of providing extra functionality within the publication website should be considered, and would recommend that Ofcom discuss the potential impact with the current website host – Unitech. A second objective concern would be that the website would need careful consideration so that it is not too complicated to navigate. Again, we would recommend that Unitech are involved to discuss various options on how this could work.

Question 71:
How could the information be made accessible to all consumers, in particular disabled consumers and consumers without Internet access?

As mentioned earlier, to support the output publicised on the "TopComm" website, we believe that Ofcom should be involved in making public statements announcing that information is available. Also, we would like all service providers to include a small leaflet within their postal bills (or web-link on e-bills) similar to that supplied by the energy industry as noted in a recent British Gas bill. The leaflet is titled "Look at how we're doing – standards of performance year xxxx", and briefly describes the measurement definition and the performance result. If the scheme is to publish data on a bi-annual basis, this equates to only two additional bill leaflets per year, which we do not feel is inappropriate in relation to cost.

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?

Yes, we agree that service providers should provide a link to the specified website, although we appreciate this is likely to be unwelcomed by them. We have no particular opinion on where the link should be or what it should say providing that it is clear on its objective and obviously apparent when viewing the service providers home page.

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?

We would expect the output to receive more credibility if it was endorsed by Ofcom. Also links to other websites, such as service providers or price comparison sites which are also endorsed by Ofcom, would possibly help improve the usage. As mentioned before, service providers could also contribute through providing extra information along with their issued bills.

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?

We have no alternative suitable suggestion to TopComm, although it would be good for any new name to be used to indicate Quality, Accuracy, Comparability, Customer Service Measures, and Communications Products. QACCSMMP ☺