

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?**

UniTech joined the TopNetUK project team to provide Secretariat support in 2006. At this time industry had already successfully worked together to specify and launch drive surveys and the corresponding output on the TopNetUK website.

Since then usage of the website has been very low and much of the feedback received from consumers visiting it has included references to 'coverage' which suggests that:

- the website is not providing the information that consumers want
- consumers are misinterpreting what the website is providing

In our opinion the website at www.topnetuk.org could be much improved from a usability and accessibility point of view and therefore UniTech would welcome a review of the scheme which promotes a website refresh both in terms of content and how it is presented. UniTech would welcome the opportunity to have some input into this and we already have some ideas as to how information could be better presented, perhaps as part of a larger site incorporating other, quality of customer service measures for services.

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?**

As the current Secretariat for TopComm, UniTech is the focus for consumer feedback on the TopComm website. Through this route UniTech has had a number of telephone calls from consumers who wish to find out more about broadband services, even though broadband is not currently covered by the TopComm scheme. This suggests that there is a need for this type of information and it also suggests that it is not clear that the TopComm website does not cover broadband services already.

Now that services are often packaged together it would make more sense for QoS measures to cover all the services that providers can offer to consumers.

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

UniTech agrees with the proposed timetable as long as the results of consumer research and surveys are available prior to the proposed definitions document working group. Any definitions to be developed must meet as far as possible a consumer requirement that has been identified.

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

Yes due to the reasons stated within the consultation document. In addition UniTech believes that if Ofcom requires industry to produce this information Ofcom should play a significant part in promoting and increasing awareness of it.

Question 5:

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

No answer given.

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. As stated in response to question 2 our experience has been that consumers are interested in more than a fixed line service and therefore the direction should be amended to include the services that consumers are interested in.

Also, it would present an opportunity to address the problems of the current scheme:

- Restrictions on Comparability Auditor
- Questionable comparability of commitment-based measures
- Lack of awareness/promotion of the results

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?

UniTech provides the TopComm website under the current option 1. Whilst some early end user feedback was considered, the decision of how data should be presented on this site was largely dictated by the TopComm members (i.e. industry). Therefore we believe the current website does not represent the most user-friendly approach.

UniTech suggests that industry should have less control over how the data is presented therefore enabling the data to be presented in a way that is easiest for consumers to interpret and use. For this reason UniTech favours option 2, where Ofcom specifies the website.

UniTech further suggests that end user feedback must be collated by Ofcom before any publication takes place and that there is funding and time available to implement the suggestions of end users.

Finally, any publication of the results should be endorsed by Ofcom to give them credibility.

Question 8:

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

No answer given.

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?

As stated in response to Q2 and Q6, it would be appropriate to include the services that consumers are purchasing, which is not limited to fixed lines alone.

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?

The consultation document suggests that ‘quarterly net revenues’ is an ambiguous term not fully understood by the regulator. A simpler threshold which is easy for both regulator and provider to calculate would be the best approach.

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?

This seems like a sensible approach. However, if providers have relatively few subscribers to a service and are wishing to promote and increase subscribers on this service it would potentially be in their interests to publish QOS information on that service.

Question 12:

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

No answer given.

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?

The information published will be most useful if a significant amount of providers take part. We believe that any threshold should not be too high as to exclude too many. We therefore favour option 1 as stated in the consultation document.

As Secretariat we do not believe that an increase in membership of +7 participants would be unmanageable.

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?

UniTech favours option 2, definitions and metrics specified jointly by Ofcom and stakeholders.

Question 15:

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

UniTech favours option 3 – replace the existing parameter with a time-based parameter.

Question 16:

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

No answer given.

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'?**

Yes.

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

UniTech favours option 3b – new parameter – total number of complaints per thousand. We believe this represents the most useful metric for consumers.

**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?**

No answer given

**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?**

Some complaints might not be service specific leaving no category for these to be assigned to – this favours a total complaints parameter across all services. The presentation of the data would need careful consideration if measurement data is split between services for other parameters.

**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?

Adequate training and careful auditing processes would be required.

Question 26:

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

Option 2: Replace the existing parameter

Question 27:

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

Yes

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.

No answer given.

Question 30:

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

Option 2: Replace the existing parameter with a time based parameter.

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?

Option 2: No change to the current regime, and extend this to broadband and mobile providers.

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?

Option 2: New parameter.

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?

No answer given.

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?

UniTech believes it would be simpler from a user's perspective to view information about individual services. The user can make a judgement about bundled services using these individual parameters.

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?

UniTech favours Option 2, report on residential customers and small businesses but not large businesses.

TopComm members with large business customers have repeatedly stated within TopComm meetings that their customers do not find the TopComm information useful. We believe the membership struggles to agree on many items due to this issue and this hampers progress in the scheme overall.

Question 41:

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

UniTech has no such evidence but has been witness to the many conversations held at TopComm meetings about this issue and therefore supports the view that large business consumers should be excluded.

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?

Yes, we think it could.

Question 44:

How could Ofcom distinguish between small and large businesses?

No answer given.

Question 45:

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

No answer given.

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?

No answer given.

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?

No answer given.

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?

Ofcom should determine the verification process. Otherwise we believe providers would choose the most cost effective approach and sacrifice accuracy and comparability as a result.

Question 51:

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

We believe that there should be an independent audit to give consumers, members and Ofcom the confidence that all providers are complying with the Direction. Furthermore this independent audit should be conducted by a single body across all providers as exists for the current scheme.

We believe it would be difficult for a single body to conduct all the independent audits without some form of internal audit taking place within providers. A two tiered approach is the most robust.

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

Question 53:

What would be an appropriate qualification for internal auditors?

No answer given.

Question 54:

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

Yes - we believe it is important for auditors to understand this specific requirement. The current online test for auditors, hosted and provided by UniTech, is a useful way of assessing them. However this format of test does have its problems. Websites can timeout if there is non-continuous activity. Also there is no way to monitor whether the user is taking the exam without assistance from colleagues. That is why we believe the independent audit provides a crucial check.

Question 55:

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

We believe internal audit frequency should match publication frequency.

Question 56:

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

We believe independent audit frequency should match publication frequency.

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?

The current frequency of publication is every 6 months, at which point 2 quarters worth of data are provided. For presentation purposes we believe that every publication should consist of a single set of new data, presenting two separate quarters in one publication is confusing and holds little benefit for consumers.

Therefore we propose that if data is to be collected and audited quarterly then it should be published quarterly. If data is to be collected and audited every six months then a single set of data should be published every six months.

Question 58:

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

We believe the period required could be 3 months or less but this would require additional resource and timely responses to issues by providers during the independent audit period and the publication period. Furthermore, if independent audit and review was undertaken during the accuracy audit period we believe this would reduce the current publication timescales considerably.

Question 59:

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

No answer given.

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?

An internal auditor should be given the power to visit sites that are responsible for the production of TopComm data otherwise we do not think an effective audit can take place.

Question 63:

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

An independent auditor should have the power to take whatever reasonable action is necessary in order to confirm the accuracy and comparability of data. Assuming an internal auditor has undertaken sufficient review and site visits it should not be necessary for the independent auditor to visit every site that the internal auditor has visited. However, site visits by the independent auditor should not be restricted on the basis of cost. Members of the TopComm Forum have suggested informally that Ofcom should meet some if not all of the costs of employing an independent auditor and meeting the expenses incurred by independent audit activity. We believe some input from Ofcom towards this cost would be welcomed by members.

Question 64:

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

We think it is important for the integrity of the scheme that auditor powers, both internal and independent, are not restricted by TopComm members based on their cost. In addition we have observed that the majority of discussion and difficulty in reaching consensus within TopComm stems from conversations about audit scope.

We therefore would welcome Ofcom's involvement in specifying the audit activity. However as mentioned above this might be better achieved if Ofcom was to contribute to the funding of these activities.

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?

No answer given.

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?

We do not have a specific view on how the auditor should be appointed, only that there is a single independent auditor across all providers and that the scope of this auditor's role is not solely within the hands of the providers (see answer to Q64).

Furthermore we believe that the existing comparability auditor is best placed to undertake the role of independent auditor for any new scheme which replaces the current scheme. The

current comparability auditor has proven capability and there have been no concerns raised about the quality of work undertaken during the lifetime of the TopComm project.

Question 69:

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

Yes. See answer 68.

Question 70:

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

Yes, if there is a consumer requirement.

As the data would already exist within the back end database it would be technically possible to present trend data. However this trend data would only be available after the first two publications and therefore the website presentation would have to cater for this. A similar situation would arise where companies join during the lifetime of any new scheme and therefore have less historic data to present.

Question 71:

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

We believe a website is the best way to present this data.

A previous scheme produced a summary leaflet to compliment the website - this was mailed to consumers on request. Given that it is difficult to predict how many leaflets would be required and that production of a leaflet could be costly, we suggest that consumers requiring hard copies would be given the opportunity to call and request information they are interested in. The website should be constructed in such a way that it is simple to print off a summary of information.

This service could be provided by Ofcom or by the Secretariat. In effect the consumer would request and receive a hard copy print out of particular data they were interested in (i.e. a custom leaflet). These hard copies would only be generated at a consumer request.

This approach would work equally well for consumers requiring Braille copies. UniTech provided a Braille service for the CPI scheme which preceded TopComm, but none were requested.

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, but UniTech is not clear how Ofcom could enforce this.

If it could be enforced, we suggest the link should appear under customer advice/information areas of the providers' websites and should not be more than 3 clicks from the homepage. The link should state something like 'Compare our quality of service with other providers in an Ofcom supported scheme'.

The link could open in a new window so that the user continues to browse the providers' website.

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?

Firstly, we think it is essential for the Ofcom logo to be visible on any promotional material. This adds credibility to the information.

Historically our experience has been that Ofcom press releases have not generated a great amount of visitors to this type of website.

There is evidence that price comparison sites are receiving a great deal of traffic. The QoS scheme should tap into this. We suggest that closer bonds between these websites and any QoS website need to be formed. Reciprocal links between two sites is not enough. Consumer progression between information on price and information on quality should be as easy as possible. This does not mean that price and quality information necessarily have to be on the same website, but the information must be easy accessible between websites.

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 believe that changing the name of the scheme is not the most important aspect. However, alternatives to TopComm should be considered and consumer focus groups ought to be approached about this.

TopComm was agreed as a suitable name by the majority of Forum members and a number of similar domains have been registered to capture visitors who may spell it incorrectly. As awareness is currently quite low there would not be any harm in rebranding the scheme – any visitors to the TopComm URL(s) could easily be redirected to a new website.

- End -