

Question 1: Do you agree with the following definition of Complaint: "Complaint means an expression of dissatisfaction made to a Communications Provider related to its products or services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.":

Yes, we agree with the definition proposed by Ofcom.

Question 2: Do you agree that a consumer should have the right to go to ADR: (a) eight weeks after a complaint is first received by a CP OR (b) earlier, if a CP has issued a deadlock letter.:

Invomo would aim to close any complaints within a short timeframe and would have no problems with shortening the current period to eight weeks.

Question 3: Do you agree with our preferred Option 4 that a CP should be required to give written notice about ADR: (a) Within five working days after the Communications Provider received the Complaint, unless the complaint has been resolved at the first point of contact - (If a consumer contacts a CP again about a matter which the CP reasonably believed to be resolved at first contact then notice should be given at that time) AND (b) eight weeks after the CP first receives the complaint, earlier if the complaint is resolved or when the CP issues a Deadlock Notice.:

Invomo agrees with the two points of notification. However, we are not clear why, under b, there is a proposal to notify the complainant of ADR details if the complaint has been resolved. Surely ADR is only needed in unresolved cases, ie still open or deadlocked?

Question 4: Do you agree that the notice about ADR which CP should give must be: (a) be in writing in a durable form be in plain English, clearly written and concise. (b) include a reference for the complaint, include details of the ADR Scheme which the CP is a member of, including contact details, (c) and summarise when the consumer has the right to go to ADR Scheme and the role of the ADR Scheme.:

Yes, we agree with these proposals.

Question 5: Do you have any comments on the criteria which we propose we will use in our future review approval of the ADR Schemes?:

No, the criteria seem appropriate.

Question 6: Do you agree that CPs' should be required to comply with a single Ofcom Approved Complaints Code of Practice which sets out high level mandatory standards for complaints handling?:

The current proforma for approved Complaints Codes sets out the basic information for satisfying GC10.2, along with expanding on the detail required by 10.2(h) ? setting out the details of the ADR scheme.

We agree that a uniform high level Code will help to maintain good standards of behaviour across the industry. The draft Code does not have a paragraph 2(a), although this is referred to in paragraphs 2(b)(ii).

Question 7: Do you agree that CPs should be required to keep a log of all complaints? We could require CPs to log complaints when they are first received and as they are handled. These records must include as a minimum for each Complaint a log setting out: (a) details of the Complainant, including their name and address. (b) the date on which the Complaint is first received. (c) a description of the Complaint. (d) and a description of how the CP deals with the Complaint.:

This is information that Invomo would already hold about complaints so we would have no concerns with this being a requirement.

Question 8: Do you agree that three months from publication of the Statement for this Review is a reasonable period to implement the changes proposed in this Consultation Document?:

Yes.

Additional comments:

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