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1 Introduction

The Carphone Warehouse Group (CPW) welcomes the opportunity to participate in the Metering and Billing scheme review consultation exercise. As an organisation active in the majority of the market sectors touched by the existing scheme, CPW believes that it is well placed to provide input into this review.

Through the company's involvement in both the UK Revenue Assurance Group (RAG) forum, and the UK Competitive Telecommunications Association (UKCTA), CPW personnel have been actively involved in the definition of two cross-industry responses submitted in response to the consultation. This document therefore serves only to highlight those areas whereby CPW's view is divergent from the cross-industry position advocated by these organisations.

2 Response to questions raised within the consultation document

1: Do you agree that it is right for Ofcom to continue to regulate the accuracy of metering and billing systems used by providers of publicly available telephone services?

CPW endorses the RAG response to Q1.

2: Do you agree that Ofcom should pursue the approach of seeking greater industry involvement in the revision and ownership of the Metering and Billing Direction?

CPW endorses the RAG response to Q2.

CPW strongly supports increased industry involvement in 'revision and ownership' of the Direction. However, following CPW's involvement in the co-regulatory TopComm forum working to implement the Ofcom Direction – "A statement on setting quality of service parameters", the company has a specific concern in this area. To ensure that industry has the correct focus in working towards detailed definition of a revised scheme, it is imperative that Ofcom meet with industry representatives at the earliest opportunity to agree ownership and accountability for the various elements of the Direction. CPW will seek clear guidance from the regulator on the scope of industry involvement, and in particular the role that Ofcom will play in approving or vetoing industry recommendations moving forward. A failure to satisfactorily address this issue has had a detrimental effect on industry efforts relating to the QoS scheme; the level of inter-operator co-operation within the TopComm forum has served to minimise the impact of this issue, but the problem remains.

3: If so, which do you think would be the most appropriate industry body to carry out this task?

CPW endorses the RAG response to Q3.

4: Do you agree with the suggested approach to the Direction that has been proposed here?

Ref. 4.6.1 - In what circumstances might the 1:50000 tolerance levels and the £500 limit be inappropriate?

CPW endorses the RAG response to the question posed in section 4.6.1.

Specifically, CPW believes that the customer is offered little demonstrable protection by the current version of the standard. Though the company attempt to make no judgement of those operators currently compliant with the existing Metering and Billing Direction, the 1:50,000 tolerance level appears an unattainable target when applied to a real-life implementation of a switch-to-bill architecture. Though CPW recognises that the UK operator community has expended significant resource in establishing control systems to minimise data loss and error, the impact of any single, unforeseeable major incident is likely to be sufficient to cause an operator to exceed the 1:50,000 tolerance. In this situation, it is common for an operator to agree a programme of corrective action with the relevant approval body, and to then exclude the impacted records from measurement statistics. CPW makes no direct comment upon this practice, but notes that, in effect, this results in hiding billing failures from customers so as to ensure that compliance to the Direction can be maintained.

CPW would support the implementation of a significantly reduced tolerance level, along the lines of the 1:100 option outlined within the RAG response. Demonstration of billing operation within this tolerance would therefore represent a true, and comparable, view of an operators billing capability, inclusive of all errors attributable to one-off incidents and other errors.

Ref. 4.6.2 - Should undercharging be subject to the same accuracy targets as overcharging?

CPW endorses the RAG response to the question posed in section 4.6.2.

Ref. 4.6.3 - In what circumstances are the individual bill accuracy requirements as they apply to complaint handling appropriate?

CPW endorses the RAG response to the question posed in section 4.6.3.

Ref. 4.6.4 - What balance should the standard strike between a Quality Assurance model reliant on the documentation of procedures and a more metrically orientated model?

CPW endorses the RAG response to the question posed in section 4.6.4.

Ref. 4.6.5 - Where relevant metrics have been audited for an alternative regulatory requirement such as an annual financial audit or the disclosure requirements of the Sarbanes-Oxley Act, in what circumstances may they be accepted without further audit for the purposes of the Direction?

CPW endorses the RAG response to the question posed in section 4.6.5.

5: Ofcom welcomes your views on how you think the Direction can be improved

CPW endorses the 8 points detailed within the RAG response to Q5.

6: Do you agree that encouraging, but not mandating, the inclusion of selected data services in the Scheme represents the best way of protecting the users of those services from inaccurate billing?

CPW endorses the RAG response to Q6.

7: Do you agree that the scope of the scheme should not be restricted to residential and SME customers, however these latter are defined?

CPW endorses the RAG response to Q7.

CPW believe it unfeasible to apply a specific set of measurements to large businesses, that in many cases have non-standard relationships with the operators concerned. CPW would recommend that the scheme be mandated to apply to residential and small businesses only, and that the cut-off point for customers to which the scheme should be applied should align with the existing definition of 'small business' as dictated within the terms of reference for the Office of the Telecommunications Ombudsman (Otelco).

8: Do you agree that the existing threshold should be retained?

CPW believes that, as a company already significantly above the existing threshold, it is not appropriate that it to respond to Q8.

9: Ofcom invites views on the feasibility of a self-declaration route to compliance with the Ofcom Direction

10: Ofcom invites views on the effectiveness of the proposed safeguard measures

CPW endorses the RAG combined response to Qs 9 & 10.