

# Guide to the Management of Billing Complaints

## 1 Introduction.

This document, in the interests of the level playing field, aims to ensure that Communications Providers have a common understanding of billing Complaints and manage them similarly.

The focus Communications Providers put on End-users is vitally important. The logging and analysis of all Complaints is an important part of any Communications Providers' business controls.

However the effectiveness of the Complaints system at finding the root cause of the Complaint is dependant on the analysis of the feedback and the assurance that the results of the analysis are brought to the attention of the relevant personnel and acted upon.

It is hoped that this Guide will assist Communications Providers in developing internal policies for managing billing Complaints effectively and in the spirit of the Total Metering and Billing System Approval Scheme and for the benefit of End-users.

## 2 What is a Complaint?

**Clause 2.1.6** of the Metering & Billing Direction (the Direction), repeated below for convenience, defines a Complaint.

**2.1.6 "Complaint"** means an expression of dissatisfaction with the Communications Provider or the service it provides, received from an End-user.

This definition above broadly aligns with the definition of a Complaint:

- ☎ used within the discontinued Comparable Performance Indicators initiative; and
- ☎ that expected to be used in the Quality of Service requirements contained in the Ofcom Document; "*A Statement on setting quality of service parameters – Notification of Direction*" published on the 27<sup>th</sup> January 2005 to address Condition 21 of the General Conditions of Entitlement.

## 3 What is a Billing Complaint?

A billing Complaint is when an End-user complains about the Bill received, the accuracy of the information on the Bill, the Bill format, the Bill frequency, the Bill timeliness, other Bill content or other billing matters.

## 4 What is an Upheld Billing Complaint?

In general an upheld billing Complaint may be considered to be (but is not limited to) one, which has resulted in a justified adjustment to the End-user's account.

Goodwill payment given without investigation does not necessarily mean the Complaint is upheld. On the other hand, it is necessary to monitor the possibility that vexatious End-users may not be granted an adjustment, even when there is patently something wrong with the Bill.

These cases may be the most likely to reveal the real problems within the Total Metering and Billing System.

## 5 What is to be done with Billing Complaints?

All Complaints including billing Complaints need to be managed to reduce and prevent justified Complaints. They should be completely assessed to determine the underlying cause, thus ensuring that errors are correctly and completely addressed to prevent reoccurrence.

**Clause 4.2** of the Direction states that “*The Communications Provider shall have, and enforce the use of, a documented process for identifying, investigating and dealing with billing Complaints and creating appropriate records thereof*”.

**Clause 4.3** of the Direction goes on to state that “*The Communications Provider shall have, and enforce the use of, a documented process for carrying out a root cause analysis for each upheld billing Complaint, categorise the cause and establish proportionate remedial action to correct it*”.

**Clause 12.1.3** of the Total Metering and Billing System Approval Scheme Guide Issue 2 (the Guide) confirms that Communications Providers are required to handle billing Complaints under a systematic management process. They must systematically analyse the root causes of errors in Bills that were the subject of an upheld billing Complaint and implement improvements to the Total Metering and Billing System to eliminate such billing Complaints by feeding them into the test and measurement programmes.

It can therefore be seen that Communications Providers would benefit from maintaining a single repository providing Complaint identification for all Complaints regardless of source and / or delivery media.

These Complaints could then easily be investigated and addressed with actions being recorded and maintained in the same repository with each Complaint being placed within a predefined category. Handover and escalation could be seamless.

The Approval Body will concentrate on billing Complaints but will look at a sample of all Complaints to ensure correct categorisation. Billing Complaints would need to be sub-categorised. (See Section 9 below).




Analysis of the root cause and extent of errors causing billing Complaints would lead Communications Providers to redesign systems and procedures to prevent re-occurrence.

It is expected that categorisation will differ from diverse Communications Providers and the Approval Body involved may require some Complaints to be re-categorised, so as to produce more consistent records and root cause analysis.

## 6 Suggested Good Practice.

The suggested good practice in dealing with upheld billing Complaints in sections 6.1 to 6.3 below was originally published as Annex D to the first Metering Systems and Billing Systems Approval Scheme Guide, published on the 9<sup>th</sup> January 2002 (de facto Issue 1). Issue 2 was published on 14<sup>th</sup> May 2004 and the information removed and transferred to this document.

### 6.1 In all cases

-  The End-user record should always be updated with the cause of the Bill error.
-  Common causes and known problems that occasionally affect individual accounts and have no cost-effective solution should have a unique identifier.
-  Communications Providers should ensure that effective communication takes place with the End-user.

- ☎ Where an End-user is withholding payment because there is a problem (he may for example believe that he has been overcharged and so no monies are outstanding), every effort should be made to avoid disconnection of service.

## 6.2 Where only one End-user account is affected

- ☎ Where the Bill error is unique to a single End-user (identifier) then only procedures and actions currently in force or as modified by way of normal business practice need to be taken to correct the root cause and address any financial inaccuracies due to that root cause.

## 6.3 Where more than one End-user account is affected

- ☎ Update or create a record containing the End-user identifier, the events or product affected by the error, the date the error first affected the End-user and the date when the problem is (will be) resolved.
- ☎ Ensure that the affected Bills are included in a recovery programme.
- ☎ If the problem is likely to affect subsequent Bills, action should be taken to ensure these are checked to be accurate before being sent to the End-user. This is likely to be the case where a switch or billing system fault is involved or a flawed manual process has not been corrected.
- ☎ If the problem affects earlier Bills, then remedial action should be taken where practicable.
- ☎ Ensure that communication with the End-user forms part of the recovery exercise. A specific point of contact, who is aware of the problem, should be given to the End-user. Where earlier Bills have been affected, the End-user should be contacted as soon as possible once the problem has been identified.
- ☎ The recovery programme should record the volume and value of corrected Chargeable Events in addition to the total value of the corrections. Fix the problem. Identify testing gaps to prevent re-occurrence and ensure that such defined “gaps” are not affecting other test arrangements.

## 7 Further Information on Complaint Handling Processes.

*“BS ISO 10002: 2004 ~ Quality management – Customer satisfaction – Guidelines for complaints handling in organizations”*

BSI can provide this international standard which details the Scope, Terms and Definitions and the Essential Elements of a Complaints Management System. It has informative Annexes dealing with Guidance, Forms, Response to Complaints, Escalations, Monitoring, and Audit.

BS ISO 10002: 2004 can be obtained from BSI by calling BSI's Customer Services department on ☎N°: +44 (0) 208 996 9001 and ordering a hard copy at a members' price of £ 53.00 or a non-members' price of £ 106.00 plus P+P when applicable.

BSI “On Line” members can obtain electronic issues through normal use of their service if subscribing to the correct sector.

## 8 Other Issues.

**Clause 12.5.12** of the Guide discusses the Complaint issue and points towards the inventory database accuracy and customers' premises equipment being linked to the Complaints handling process.










**Clause 12.6** of the Guide discusses the Complaint issue and indicates that improved billing accuracy can be achieved by reducing Complaints and that the Complaints themselves are a barometer for billing accuracy.

**Clause 12.7** of the Guide discusses the Complaint issue and links an increase in Complaints to untimely billing.

## **9 Complaint Categorisation.**

To satisfy the Direction, Complaints may be categorised simply as “billing” and “non-billing” Complaints but each should have their own sub-categories. A Communications Provider should determine a range of sub-categories appropriate to its business.

The billing category not limited to but might contain sub-categories such as:

-  incorrect product scope in the Bill;
-  incorrect tariff applied to the Bill;
-  incorrect discounts applied to the Bill;
-  incorrect address recorded on the Bill;
-  timeliness of Bill commencement or cessation;
-  timeliness of Bill delivery;
-  currency used on the Bill;
-  duplication of billing; and
-  service access problems.

## **10 Targets for Complaint Handling.**



The objective should be to address and resolve all billing Complaints in a timely manner, such that the issue is not perpetuated on subsequent Bills.

As a point of information, assessment in the discontinued Comparable Performance Indicators initiative was against a target resolution period of 20 working days for all Complaints.

## **11 Dispute Resolution.**

Condition 14.3 of the General Conditions of Entitlement requires a Communications Provider to implement and comply with a Dispute Resolution Scheme.

At the time of writing, the following two organisations have been established under the provisions of the Communications Act 2003 to investigate Complaints from residential and small business customers:

-  the Office of the Telecommunications Ombudsman (OtelO), please see [www.otelo.org.uk](http://www.otelo.org.uk); and
-  the Communications and Internet Services Adjudication Scheme (CISAS), please see <http://www.arbitrators.org/CISAS/index.asp>.

Furthermore, the Independent Committee for the Supervision of Standards of Telecommunications Information Services (ICSTIS) is responsible for regulating premium rate phone services and Complaints about these could be received by them. Please see [www.icstis.org.uk](http://www.icstis.org.uk).

**12 Further Guidance.**

Ofcom published on the 24<sup>th</sup> May 2005, a document “*Customer Codes of Practice for handling complaints and resolving disputes Guidelines for public electronic communication service providers seeking Ofcom approval*”. This is available from Ofcom.

If a Communications Provider has difficulty designing or implementing a system to comply with the requirements, further guidance can be sought in the first instance from its chosen Approval Body.

