

# Metering & Billing Systems Approval Scheme

## Annual Open Forum 2

***“Consumer Protection, Revenue Assurance, Regulation  
- Is the balance right?”***

**20th October 2004**

- **Introduction**
- **Announcements**
  - **Fire alarms**
  - **Mobiles**
  - **Refreshments**
  - **Usual Offices**
- **Setting the Scene**
  - **Bill Hawkins - M&B Programme Manager**

# Setting the scene ... last year

- Spring 2003 First M&B Open Forum:
  - OTR003:1993 approval holders in transition
  - Network Providers (PTO Licence Holders!) addressing themselves to requirements
  - First OTR003:2001 approvals granted to T-Mobile & Vodafone
- July 2003 - seamless transition to new framework
- Dec 2003 - All £40m PATS providers brought into scheme
- 29th Dec 2003 - Ofcom replaces Oftel

# Setting the scene ... where are we now?

- Currently there are:
  - 10 Approval holders
  - 17 companies working towards Approval
- Operational Challenges
  - Multi-CP TMBSs and apportionment/controls
  - 3G and new services
  - Level Playing Field
  - Confidentiality versus Transparency
  - New CP Industry Group?
  - Press Coverage

# Setting the scene ... Approval Body Forum

- BABT, BSI, NQA and Ofcom (Chairman)
- Meets quarterly or more frequently if necessary
- Promotes Level Playing Field
- Strives for even handed treatment of CP issues
- Shares experience
- Maintains confidentiality
- Open to CP representation for specific issues
- Consults with CPs on proposed guidance
- Approves and publishes agreed guidance via Ofcom

## Typical Agenda

- Formal routine business, document control, adoption of minutes and agenda, etc.
- Discussion of topical issues and concerns, e.g.
  - Treatment of multi-CP TMBSs and modelling
  - Measurement strategies
  - Ring fencing incidents, rolling averages
- Development of formal guidance documents
- Review of any new SUS Claims
- Notifications and Consultations

## Review Framework - the bold statements

- Existing £40m PATS companies will be required to complete under the current arrangements
- Paramount objective - Consumer Protection - there will always be a requirement for accurate billing supported by monitoring and enforcement procedures
- Purpose - To identify the least intrusive way of protecting customers by ensuring bill accuracy

## Key elements of existing arrangements

- Exclusion of pure data from existing mandatory scope
- £40m PATS threshold
- Requirement for formal Approval
- Insistence on a particular Standard
- Role of the 3 designated Approval Bodies

## Pre-Consultation Phase

- Developing policy alternatives for formal consultation
- **“Health Warning”**
  - Ideas offered are **not** official Ofcom policy
  - The principle is that no possibility is axiomatically included or excluded.

## Three Ideas

*(... that might represent policy options\*)*

- Self-certification process as an alternative to third party approval
- Integrate M&B with existing QA certification *(although not usual to include numerical parameters)* and Financial Auditing
- Ownership of Standard passed to an industry body (may still require Ofcom presence)

*(\* See previous slide - Health Warning!)*

## Process

- Consultation Document
- Statement
- Consultation on any changes to the Direction
- Statement to issue revised Direction
- Consultation on any changes to Condition 10 of the General Conditions of Entitlement
- Statement to issue revised GCoE
- GCoE changes may be held and grouped in a batch, rather than dealt with one by one

## Review Framework – put another way

### Paramount Regulatory Objectives

- **Consumer Protection**
- **Maintaining Consumer Confidence**

*... So it's just a question of whether the current scheme is the best way of doing it?*

# Back to today!

- **Comments/issues/questions for discussion time**
- **Morning**
  - BT Wholesale in the context of a multi-CP TMBS - Derek Keeble (BT)
  - TMBS Benefits to a Reseller and the importance of a strong QMS - Theodore Richards (Caudwell Comms)
  - CSP Perspective - Kevin Hansford (CPW)
- **Afternoon**
  - Looking towards 3G - Peter Browne (Vodafone)
  - Perspective on Procedural Management in the Broader Audit Environment - Mark Forson (Global Crossing)
  - Measurement Strategy - Paul Daubney (Telewest)
  - New Industry Group - Tony Ash (T-Mobile)