

Title:

Ms

Forename:

Claire

Surname:

Milne

Representing:

Organisation

Organisation (if applicable):

Antelope Consulting

I have addressed only the changes proposed to General Condition 9, which represent an opportunity to move towards easier comparison of different providers' offers. Please see below for more detail.

Question 1: Do you agree with our proposed approach to definitions?:

Question 2: Do you agree with our proposal to add CEPT to the list of standardisation bodies?:

Question 3: Do you agree with our proposals to extend the requirements of GC3 beyond ?fixed locations? and to require CPs to ?take all necessary measures? to maintain their networks and services and access to emergency services?:

Question 4: Do you agree with our proposals for emergency call numbers - which includes amending the definition of CP and requiring that location information is provided free of charge, as soon as the call reaches the emergency organisations and is accurate and reliable (in line with our proposed high level criteria)?:

Question 5: Do you agree with our proposed approach to contract related requirements relating to the provision of additional information, the length of contracts and the conditions for termination?:

I suggest that in addition to what is proposed here, Ofcom require (or at least encourage) providers to make the information listed in GC9.2 available in an easily comparable way. This could be for example by completing a standard spreadsheet which would then be made

available on their website, and/or sent on request to anybody requesting it (together with updates and as when they occur). This would help comparison websites to show users how the offers from different providers vary. Eventually pricing should also be provided in standard form to make comparisons easier.

Question 6: Do you agree with our proposals to ensure equivalent access to the emergency services for disabled users and to mandate the provision of Emergency SMS?:

Question 7: Do you agree that given the existing measures that are in place to help disabled users to access 116XXX services, it is not necessary to make further changes to GC15 in this respect?:

Question 8: Do you agree with our proposals on conditions for transferring the rights of use of telephone numbers and also for granting their use for a limited period of time?:

Question 9: Do you agree with our proposals on the one working day requirement in relation to bulk mobile ports and in relation to fixed porting? If not, please explain why?:

Question 10: Do you agree with our proposed approach to the porting compensation scheme requirement?:

Question 11: Do you agree with our proposed approach on requirements relating to ensuring access to all numbers within the Community, the charging of ETNS numbers and calling the hotline for missing children on 116000?:

Question 12: Do you agree with the proposed obligation on universal service providers to notify us when they are disposing of part or all their local access network assets?: