

Stephen Green
Consumer Affairs
Ofcom
Riverside House
2a Southwark Bridge Road
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SE1 9HA

25th August 2015

Metering & Billing Approval Logo

Dear Stephen

This response has been prepared on behalf of Nine Group. Nine Group provides a wide range of communications services including a range of voice and data products including wholesale billing services. Nine Group offers its services directly to end user customers through its Nine Telecom division and via resellers through the Nine Wholesale operation. Nine has in excess of 400 reseller partners of all sizes located throughout the UK.

You can find out more about Nine Group at our website www.ninegroup.co.uk

We welcome the opportunity to respond to this consultation and strongly support Ofcom's proposal to introduce an Approval Logo for CPs who have had their metering and billing systems approved, on either a mandatory or voluntary basis.

We agree with Ofcom's view that the logo will encourage CPs and others providing billing services to the industry to have their systems assessed and approved.

We also agree that the existence and use of such a logo will enable customers to establish quickly which providers have been approved and simplify their decision process.

However, we note that many end customers purchase services from resellers who use their wholesaler's billing systems to produce their bills or from CPs who outsource the billing function to a third party bureau service. We suggest that Ofcom should consider under what circumstances such CPs may be permitted to use the Approval Logo (or a version of the logo).

We recognise that such an extension of the scope of the proposal introduces some additional complexity into the issue but strongly believe that such an approach would result in more widespread recognition of the logo and its significance and would improve its effectiveness. We would be happy to discuss with Ofcom options for how this might be best achieved.

Q1: *Do you agree with the proposal to introduce an Approval Logo? Please explain your reasons for your response.*



Yes. We agree that this will encourage CPs and third party billing providers to achieve accreditation and will provide reassurance to customers as well as assisting them in choosing a provider.

Q2: *Do you agree with the proposed changes to the Direction? Please explain your reasons for your response.*

Yes, we agree that the proposed changes, giving the relevant approval body responsibility for notifying the CP of its entitlement to use the logo (and which version) makes practical sense.

In light of our comments above on use of the logo by resellers and CPs who use a third party billing service, we recognise that this may also involve approval bodies deciding on the entitlement to use the logo (or a variant) by resellers or CP customers of the approved wholesale or third party billing system.

We trust this response is helpful and will be happy to provide any additional information or discuss the issue further.

Kind regards

Michael Eagle
Industry Liaison and Regulatory Support