

Title:

Mr

Forename:

Robert

Surname:

Mcnamara

Representing:

Organisation

Organisation (if applicable):

MoneySuperMarket.com

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What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree that notice period requirements can give rise to difficulties and deterrents where consumers seek to switch? In particular, do you agree that these are likely to include: unwanted double payments, difficulties coordinating the switch, and a deterrent to consumers who might otherwise have chosen to switch?:

Yes. The fact that notice periods vary makes it difficult and confusing for consumers. It also increases the potential for double payment and/or loss of service.

Question 2: What is your view regarding the extent to which consumer harm might differ for consumers using the PAC process or C&R arrangements to switch?:

The gaining provider led model is MoneySuperMarket's recommended approach. However, when comparing the C&R process with the PAC process, we believe that the C&R process is more effective at reducing consumer harm. The reason for this is that the C&R process requires a phone call between the consumer and the losing provider, thus reducing the possibility for confusion. The PAC process does not require such a call.

Question 3: Do you agree that the removal of charges for notice beyond the switching and porting date is effective in addressing the consumer difficulties and costs with switching we have identified? :

Yes, this removes issues with double payment and the lack of consistency across the industry over notice periods. It would align the notice period for mobile providers and remove the onus on the customer to be aware of each provider's notice period.

Question 4: Do you agree with our proposal to enhance the two proposed options for switching process reforms set out in the March 2016 consultation - i.e. Automated PAC and Gaining Provider Led - with proposals to remove charges for notice beyond the switching and porting date?:

Yes, we agree and the enhanced GPL version is MoneySuperMarket's strong preference.