

Title:

Mr

Forename:

John

Surname:

Knudsen

Representing:

Organisation

Organisation (if applicable):

broadbandchoices.co.uk

Email:

What additional details do you want to keep confidential?:

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 with Ofcom's conclusions that there is no need for a fundamental revision of the Scheme at this time?:

We agree with Ofcom's conclusions that there is no need for a fundamental revision of the scheme at this time.

Question 2: Ofcom is proposing to revise the approval requirements with respect to the provision of information on Quality of Service metrics. Are there other aspects of the scope of the Scheme that we should revise?:

We believe that Ofcom have covered all of the main parts of the Scheme that need to be revised in this consultation.

Question 3: Ofcom is proposing to revise five areas around the operation of the Scheme. Are there any other aspects that we should revise?:

We believe that revising the five areas stated in the consultation will be sufficient to ensure that the Scheme adheres to its main principles and values.

Question 4: Ofcom is proposing to include a requirement in the approval criteria that PCWs include in their results pages for broadband comparisons clear messaging on speeds, and provide information about Ofcom's comparative information and about online speed checkers. Do you agree with these proposals and our analysis of their impact? Please give reasons and if appropriate state alternatives.:

Option 2 - We agree that providing 'up to' speeds and informing consumers that speeds might vary from advertised speeds in the way described in the Review document is helpful and could enhance the consumer experience.

Option 3 - We believe that it could be useful to provide a link to Ofcom's work on broadband speeds, provided that:

a) Such information [on the Ofcom site] was clearly and simply explained and in a "consumer friendly" format. Our concern is that this is not always the case with Ofcom-produced data/information and that this could subsequently cause additional confusion to consumers which would frustrate potential customers and reflect poorly on the PCWs; and

b) Such information was [only] on general/background information pages so as to not unduly disrupt the consumer experience whilst conducting a price comparison on the PCWs.

Option 4 - We agree that allowing users to test the speed of their current broadband connection via an online speed test tool would be useful provided such information was [only] on general/background information pages so as to not unduly disrupt the consumer experience whilst conducting a price comparison on the PCWs.

Question 5: Ofcom is proposing to amend the approval criteria so that PCWs providing broadband comparisons give details of any data usage limits on the results page. Do you agree with these proposals and our analysis of their impact? Please give reasons and alternatives where appropriate.:

We agree that the change to the approval criteria which will require price comparison websites to show limits on data usage on the results page for broadband search comparisons will enhance the overall consumer experience.

Question 6: Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information about traffic management policies. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.:

We agree with the proposal of Option 2.

The provision of general information about traffic management and links to communication providers' web pages and links to Ofcom web pages could be beneficial for consumers provided such information was [only] on general/background information pages so as to not unduly disrupt the consumer experience whilst conducting a price comparison on the PCWs.

Question 7: Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information about Ofcom's comparative customer service and complaints information. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.:

We agree with Option 1.

There should be no change to the existing policy.

We believe that the comparative customer service and complaints information offered by Ofcom comprises only a one part of the overall consumer decision making process and should not be given undue prominence in isolation.

Our own, regular and comprehensive research has identified nine key "satisfaction" factors that influence consumers behaviour when comparing providers, of which customer service is one.

We have built our own "star rating" that we utilise in comparison results and we believe that this provides a more comprehensive indication as to how satisfied customers are with their provider. Consequently we believe that external links on this part of the user journey on our PCW would have an adverse impact on the overall consumer experience.

Question 8: Ofcom invites views on our proposals to publish guidance on past decisions and to carry out quarterly spot-checks. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.:

We believe that having more frequent spot checks between audits would make sure the developments made to our site are consistent with the requirements of the scheme. However, we believe that introducing semiannual checks would provide adequate frequency to ensure that the high standards of the accreditation scheme are maintained without becoming overly burdensome from an administration point of view.

Question 9: Ofcom is proposing to modify the charging schedule to the effect that companies or other entities with two full-time equivalent employees can benefit from the lower charges. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.:

We disagree with this proposal. We believe that flat pricing is a fairer approach for the accreditation process and that the fee levels and number of staff chosen appear fairly arbitrary.

In addition, we do not believe a PCW with 2 employees [or less] would be able to maintain a service that would genuinely meet the Ofcom accreditation requirements.

Question 10: Ofcom invites views on any additional publicity that Ofcom should be giving to the Scheme and accredited PCWs and on any changes to the Scheme logo we should consider.:

We believe there is scope for Ofcom to invest in building greater consumer-based awareness of the accreditation scheme.

We feel that whilst the scheme resonates with the business community (ISPs, journalists; other price comparison sites; business partners), general public awareness is much lower. The greater public awareness and understanding of the value of the scheme, the more consumers will gravitate towards - and thus benefit from using - Ofcom accredited sites.

We would be interested in Ofcom researching levels of prompted and unprompted scheme awareness and then proactively engaging with accredited sites to identify and implement PR initiatives to help to raise this.

Question 11: Ofcom is proposing to require accredited PCWs to have a complaints handling process in place, which shall be clearly set out on their websites. Please indicate whether you agree with the proposals and giving reasons and alternatives where appropriate.:

We agree with Option 2. We believe it is important for consumers to have a complaints process which is clearly explained, fair and dealt with in a timely manner.