

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

**Email:**

**What additional details do you want to keep confidential?:**

Keep name 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?:**

No - PCWs do not provide the whole picture.

**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?:**

Yes. The purpose of PCWs is to “help consumers get accurate, transparent and comprehensive advice comparing communications providers and services”; The EU also say “the final product price should be provided”. This is not the case. PCWs compare advertised broadband prices and present yearly costs on broadband only. In all cases the customer cannot sign up for broadband alone and have to take line rental and calls with the broadband. To this end the providers have been increasing their line rental, call connection costs, call rounding to the nearest minute to subsidise the broadband cost and then have been advertising a cheap broadband headline price and special offers to new customers heavily discounting the broadband element but the

new customer has to take all the products. The full price should be all the products together not just the broadband - it is totally misleading. Talk Talk have recently been offering broadband at zero cost which ranks exceedingly well on PCWs but is not the “final product price”. The Co-operative Phone and Broadband keep line rental much lower than the competitors and don't round call costs to the nearest minute - the whole cost of the packages is competitive but they are not on PCWs. Smaller players are not being included and are being forced to follow the smoke and mirrors pricing policy of our competitors because we cannot get ranked on PCWs. This is defeating the object of PCWs.

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

No

**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.:**

Agreed

**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.:**

Yes

**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.:**

Yes

**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.:**

Yes

**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.:**

Agree

**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.:**

Agree

**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.:**

No

**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.:**

Yes