



Vodafone Response to Ofcom Consultation:

Metering and Billing Approval Logo

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Vodafone welcomes the opportunity to comment on Ofcom's consultation on the Metering and Billing Approval Logo. Vodafone recognizes the value of introducing an Approval Logo to indicate that a Telecom Service Provider's Total Metering and Billing Systems ('TMBS') has been approved by third-party assessors against the requirements of Ofcom's Metering and Billing Direction. The introduction of the Logo will assist customers for whom the accuracy of billing is an important criteria when comparing CPs or seeking information about their Communication Provider's billing systems. Consequently, to the extent that the availability of the Logo encourages Communication Providers to seek approval of the accuracy of their Metering and Billing systems, consumers' protection will be enhanced – not just by raising awareness of the approval scheme but also by facilitating customers in making informed decisions when choosing a Communication Provider.

Due to the above considerations, Vodafone agrees with the proposal of publishing a list of Communication Providers' approved Total Metering and Billing systems on Ofcom's and the Approval Body's websites. Nevertheless, Ofcom should clarify how the Approval Logo and the publication of the Communication Provider's name on the Regulatory Bodies' websites would apply to Network Operators where approval has been granted for just part of the organization or product set. Noting approach to gain approvals the plan envisages different parts of the organisation may be staggered. Similarly, Ofcom needs to specify what happens in the scenario in which a 'not approved organisation' is acquired by an entity with an 'Approval Logo' or vice versa. Guidelines on how the Logo would apply to companies which are seeking to make internal changes are also needed.

Vodafone also agrees with the adoption of different Approval Logos for the below product categories:

- Voice services;
- Voice and data services;
- Wholesale voice and data services; and
- Wholesale voice services.

However, Ofcom needs to clarify how the Logo applies if the Regulatory Body has granted approval just to part of a Network Operator's product offering.

Finally, Vodafone is keen on the adoption of an Approval Logo provided that the latter is introduced in a way which allows all applicants to apply and ensures a level playing field for all operators. Ofcom needs to ensure that, when the Approval Logo is introduced, every Communication Provider will be able to benefit from the competitive advantages which the Logo brings.