

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

25<sup>th</sup> August 2015

Dear Stephen

### **Metering and Billing Approval Logo**

This response has been prepared on behalf of Union Street Technologies Ltd. Union Street is a leading player in and specialist provider of telecoms billing, customer relationship management and WLR ordering solutions for communication providers (CPs).

Our aBILLity application suite is used by more than 400 CPs across the UK (and worldwide) as a core component of their operations. You can find out more about Union Street and the services we provide on our website at [www.unionstreet.uk.com](http://www.unionstreet.uk.com).

We welcome the opportunity to respond to this consultation and strongly support Ofcom's proposal to introduce an Approval Logo for CPs (and others) 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 such end customers purchase services from reseller CPs 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 variant of the currently proposed logos).

We recognise that such an extension of the scope of the proposal potentially 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 among end customers and would also 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 is appropriate) 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 note that this may also involve approval bodies deciding on the entitlement to use the logo (or a variant) by resellers or CP customers of an 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.

Yours sincerely

Michael Eagle  
Industry Liaison and Regulatory Support