

**Title:**

Mr

**Forename:**

Jim

**Surname:**

Taylor

**Representing:**

Organisation

**Organisation (if applicable):**

Kwik-Fit Insurance Services

**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 the Direction should continue to apply fixed and mobile voice services (aside from wholesale services and services for large business) and that its requirements should remain unchanged? Please provide reasons to support your response.:**

We believe the current arrangement is working corrently for consumers and busineses

**Question 2: Do you agree that encouraging, but not mandating, the inclusion of data services in the Scheme represents the best way of protecting the users of those services from inaccurate billing?:**

We believe the current arrangement is working corrently for consumers and busineses

**Question 3: Do you agree that the provisions on data billing in Annex D of the Direction should be reviewed and updated? Please identify any issues that you believe the review should consider.:**

No view on this issue

**Question 4: Do you agree that the scope of the scheme should continue to apply to large businesses? Please provide evidence for your views in particular providing evidence on whether large businesses are able to and do monitor their bills more effectively than other consumers?:**

We believe that the current requirements should continue to apply to large businesses and that Suppliers (CP's) should continue to be audited on their billing platforms for billing accuracy and the billing data processes.

In our experience our telecoms billing team do not have sufficient experience or access to suppliers billing platforms to confirm that its billing calculations are correct and more importantly that the billed minutes are correct.

Our billing team can check the accuracy of the final bill supplied to us using agreed tariffs, however the basic flaw is that we rely on the supplied data from the supplier to check the call minutes

Unless the suppliers billing platforms is independently audited each customer would be trying to verify these billing platforms separately and with fewer resources than the current auditors

**Question 5: Do you agree that with the proposal that error rates and tolerances set in the Direction should not apply in respect of business? What requirements should apply in the absence of error rates and tolerances, if any? :**

We see no reason why there should be any change to these tolerances and error rates.

Customers (large or small) pay for a service and it should be billed accurately

**Question 6: Do you agree with the suggested definition of a large business as having a communication spend in excess of £50K? Please provide reasons and any evidence for any response.:**

We believe this figure is far too low for the definition of a large business.

In the context of the consultation the suggestion is that a large business will have additional resources to check a bill, but with a spend of only £50K it is unlikely that an organisation would be able to justify the staff needed to verify the billing.

**Question 7: Do you agree with the proposal that wholesale services should be removed from the scope of the Direction? Please provide reasons for your views.:**

No view on this question

**Question 8: If wholesale services are removed from the Direction, to what extent should the relationship between retail and wholesale CPs be covered in the Direction?:**

No view on this question

**Question 9: Do you have any further observations or evidence on the Metering and Billing Direction?:**

We believe that over a 3 month period all billing should be completely accurate,

If it is impossible to verify a bill (Summary section 1.10) then there should be a requirement to discount customers bills to prevent overcharging by whatever level of inaccuracy auditors say is likely to happen in practice.

Since customers pay for this service billing accuracy is expected and there is no reason why a larger business should be treated any differently to a small business.