

A4. Consultation questions

A4.1 This Annex lists the question that we are consulting on.

Question 1: Do you agree with our proposed changes to the scheme criteria?

Please provide evidence to support your views.

We are an Ofcom accredited site under the current scheme.

We support the concept of Ofcom accrediting suitable price comparison sites to give consumers a higher level of trust in these services.

We are broadly supportive of the proposal to allow more flexibility in how accredited sites may work to allow innovation as the current scheme is in some respects overly prescriptive in some areas.

We do have some concerns as to the proposals as put and these are as follows:

- Requiring PCW's to link to Ofcom's speed testing tool. We, as well as other sites, offer our own speed and line testing services, and these are an important driver of visitors to our site. Being required to promote a third-party tool would have a detrimental effect on our business model.
- We have concerns about how Ofcom would require the large number of disclaimer and explainer texts that the consultation seems to suggest will be necessary. We think that this may have an unintentionally negative effect if it ends up suppressing the amount of deal information that can be provided in limited screen real estate which could make the tools less useful for consumers.
- We have concerns about how the requirement for "quality" metrics is expected to be implemented as these can be very location dependent.
- It's unclear as to whether PCWs that present deals based on the highest revenue for the PCW would be able to gain accreditation, we would suggest that they should not and that any "innovative" sorting methods should detail how they calculate the sort in a way that end users can replicate so that transparency can be maintained.
- We are concerned that requirements for displaying details including types of contracts, possible or known price increases, e.g. annual rises with inflation, and product components, such as upload speeds or call plan tariffs, are either omitted or simply alluded to without specifics. In order maintain the quality of comparisons, value to the consumer and trust in the accreditation scheme, we feel there should be clearer minimum standards for which items should be displayed in comparison grids, and which should be given in supplemental details, eg under a 'More Details' link.

- Requiring address level comparisons may be counter-productive as site users are very reticent to provide personal information above the postcode level. In some cases, PCWs will not have access to address level information for all providers.
- We believe that the accessibility standards that accredited sites should provide be more clearly defined and should include keyboard navigation and screen readers.