

**Question 1: Do you agree with Ofcom's conclusions that there is no need for a fundamental revision of the Scheme at this time?**

We believe that the scheme is due reform - considering the rate of change in the market, and the need for greater consumer protection, engagement and empowerment.

The current criteria are mainly fit for purpose, but we feel that a couple of tweaks would help to make comparison sites more consumer-friendly and effective in helping consumers find the best deals.

Under 'Accuracy', we feel that updating the data used every 8 weeks is not sufficient. Providers change deals much more frequently than this, and not updating comparison tables could lead to consumers being mis-led and frustrated. We believe that updating data should be done on a daily basis.

Under 'Comprehensiveness' we believe that it should read "Price comparison calculators should offer consumers the choice to input their location information to show what is available to them." This is important as many consumers don't like giving locational information, and it may put people off the process of comparing.

**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?**

We agree that Ofcom needs to reassess the quality of service metrics - as the websites that provided this information no longer exist, but consumers value quality of service as well as price.

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

We believe that reviewing these five areas is sufficient. We are particularly concerned as to how Ofcom will improve publicity around the scheme to consumers. The scheme plays an important role in advising consumers as to which sites they can trust, empowering them and helping them to make an informed decision. However, in order for this to happen, consumers need to be aware of the scheme and the role Ofcom plays in regulating comparison sites.

**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.**

For consumers to be empowered and engaged they need to be armed with the right information, and as much as they need, to be able to make an informed decision. This is vital. We also believe that consumers remain confused about advertised up to speeds.

Therefore, we agree that having information about up to speeds is a necessity. However, having links out of a results table that do not lead to the providers site could make the switching process more complicated and less consumer-friendly, and could lead to less consumers finishing the switch. A

pop-up explaining that the meaning of an up to speed would be sufficient, as long as information about speeds for your area - along with links to Ofcom's speed tests - is elsewhere on the site.

As an aside to the accreditation criteria, we believe that providers should only be able to have an advertised up to speed that is more reflective of the market. We feel that 10% of customers getting the speed isn't enough - and would urge Ofcom to move this figure more in line with other markets, such as representative APRs in the credit card market, which must be available to 51% of the market.

**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.**

If information on data limits is displayed, the difference between truly unlimited, and plans with a fair usage policy, must be made clear. However, our research does show that download limits are important. Therefore, we believe that this information could be useful, so agree that Ofcom should amend the criteria accordingly.

**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.**

Our research shows that understanding traffic management policies is a problem for consumers

However, when asked to prioritise criteria when choosing a new broadband package not many factored into their purchase. This means that it is a fairly low priority for consumers.

So while accepting that there is an issue with understanding of traffic management, we would question the need to highlight this information on a comparison table. Our concern is that this could cause further, unnecessary complexity/ confusion to the process. Therefore, we suggest that information about providers' policies should be explained on providers' pages within comparison sites, as well as within any 'guides' sections.

In order to ensure that this information is up-to-date and as useful to consumers as possible, providers themselves need to work with comparison sites and provide them with clear information that is updated as necessary, as well as providing links where appropriate.

**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.**

We believe that customer service is important in deciding on a new provider for broadband or mobiles. Although our research shows that it is the fifth most important criteria for consumers, it still ranks relatively highly, and the popularity of our Customer Satisfaction Awards - now an annual awards event for mobiles and broadband - show that customer service is an increasingly important factor.

Therefore, we feel that it's essential that consumers have easy access to information about customer service and complaints in order for them to make the most informed decision possible.

However, as in the case of uSwitch.com, some comparison sites have their own measure of customer care. We believe that as long as some indication of customer service is visible on the site, there is no need to link to an external site - namely Ofcom. This could lead to customers being redirected to other websites, making the switching process more drawn out and complicated.

Consumers using a comparison site tend to trust the information it provides - including its metrics on customer service. If consumers don't understand the role of Ofcom (as perhaps suggested by the lack of awareness of the Accreditation Scheme), linking to Ofcom's findings may not be the best step in helping consumers. Therefore, we believe that, while Ofcom's figures could be highlighted on comparison sites, comparison sites should be able to use their own customer service findings instead.

**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.**

If Ofcom's scheme is to be trusted and valued by consumers, it's vital that comparison sites touting the accreditation cannot abuse this position and make changes to their site - which would impact their accreditation status - between audits. This would de-value the scheme, and only serve to damage trust in comparison sites, Telecoms providers and the regulator. However, we would need Ofcom to clarify that there will no additional costs to PCWs for these extra checks.

**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.**

We believe that in order for the scheme and accredited sites to be valued more highly by consumers, media and other stakeholders, Ofcom needs to show its value. If Ofcom was to implement major consumer-friendly changes in the Telecoms market, consumers would be more likely to recognise its work. These changes could include, but are not limited to, ensuring mobile providers can't implement price rises within contracts, enforce more frequent and bigger fines for cases of misleading customers, and issuing reminders about contract end dates - an issue that uSwitch.com firmly believes would be of great consumer benefit.

**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.**

As mentioned previously, we believe that customer service is an important factor in choosing a telecoms provider - consumers are no longer entirely led by price, but value. Therefore we agree that providing contacts and information on complaints handling will be of benefit to consumers.