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Additional comments:

The wording "Ofcom wants to create a stronger deterrent effect to help reduce the continuing levels of complaints to Ofcom and contraventions of regulatory requirements." is unfortunate: it makes it appear that reducing OfCom's workload, rather than reducing the number of contraventions, is the primary purpose of the proposed revisions. (At least I _hope_ that isn't the primary purpose!)

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Sections 1.18 (repeated at 5 in Annex 4) and 1.22 to 1.23 are particularly well-written.

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Although it is right that the principle aim should be deterrence (1.18 and 1.24), the fact that resources are not unlimited (1.17) should not preclude cost-reclamation from being involved, with the possible exception that where the offender's turnover is sufficiently small that such might imperil their continued operation (though in such cases it is to be hoped that informal warning would have the desired deterrent effect before significant costs are incurred).

Question 1: Do you have any comments on the proposed draft penalty guidelines below?:

The general tone of the revision seems excellent! In particular, the increased emphasis that the turnover of the offending body is likely to be taken into account.

[(new) section 12: "Any gain (financial or otherwise) made by the regulated body in breach (or any connected body) as a result of the contravention" - I suggest move the second phrase in brackets two words to the left.]

I don't think there is need for section 19 [new number, old words] (OfCom won't exceed the maximum) - I'd have thought that should go without saying.

[(new numbering) sections 22 and 23 could be combined into one.]

But in general, I think the proposed revisions are excellent; I only hope they make OfCom more effective. (You might add something about a costs-reclamation element.)