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25 August 2015

Dear Stephen

Ofcom's Review of the Metering and Billing Approval Logo

This is Hutchison 3G UK Limited's (Three) response to Ofcom's review of the Metering and Billing approval logo. Three is grateful for the opportunity to comment on Ofcom's proposal to introduce an Approval Logo for the Metering and Billing Scheme.

Three believes that high quality, accurate and timely billing is an essential part of the customer experience and there is a clear responsibility on Communications Providers to ensure billing is both accurate and to the highest standards. We recognise that getting a bill right is a fundamental customer service requirement. Customers need to know that they are only paying for the products and services they use. This creates both trust in the brand and customer satisfaction. Failure to offer accurate bills would result in customers switching suppliers as well as the high costs to providers in dealing with billing queries. Current high standards associated with billing are not just a consequence of the Ofcom Direction but rather a consequence of a highly competitive market.

Ofcom's consultation looks specifically at whether there are benefits in introducing an approval logo and recommends the introduction of a voluntary scheme. The concept of a logo is primarily to increase awareness amongst consumers of the approval scheme in place for CPs' metering and billing systems.

However, Three does not believe that awareness of the metering and billing approval scheme is an issue for customers nor that they find it difficult to find information about which CPs' systems are approved or even that this is an important criteria when comparing CPs. We know of no evidence to the contrary. Accurate bills are clearly important, but customers expect these as an essential part of any CP's service.

The consultation document itself does not include any evidence that demonstrates that an approval logo for the metering and billing scheme is required. The document refers to discussions with the independent approval bodies but does not include any market research being conducted with consumers setting out the specific benefits they would derive from having an approval logo. Without strong evidence we believe there is no case to press ahead

with this proposal as it is entirely speculative that increasing awareness would necessarily lead to customer benefits or that a change would be proportionate, given the associated costs of introducing such a logo.

We would be happy to discuss our response with you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jillian Phillips', with a large, stylized initial 'J'.

Jillian Phillips
Head of Legal,
Customer & Consumer Regulatory