

Telecom Plus response to response to Ofcom 2014 consultation - Review of the Metering and Billing Direction

Question 1: We invite stakeholders? views on the proposed removal of target-based requirements across all retail services and evidence to support their views:

We agree with the removal of target based requirements across all retail services. The focus on achieving compliance to defined accuracy tolerances often becomes an end in itself rather than a catalyst for improving services to consumers. The continuous surveillance and refinement of the operation of a Total Metering and Billing System drives improvement in billing accuracy and ensures that errors are effectively detected and addressed minimising their impact on consumers. It will benefit consumers to ensure this is the main focus of the Direction.

Question 2: We invite stakeholders? views and evidence on the practicality of the proposed new timeframe for approval as set out in paragraph 5.1 of the draft new Direction.:

The new timeframe is practical for Communications Providers such as ourselves who do not own or operate network infrastructure.

Question 3: We invite stakeholders? views on whether the proposed revised definition of EPF would be workable. We also welcome any alternative suggestions for the definition.:

The new definition for an EPF is workable however the trigger for a full review of a TMBS should not be prescriptive but reside with the judgement of the Approval Body based on analysis of the causes of each EPF and knowledge of the TMBS.

Question 4: We invite stakeholders? views on the proposed timeframe for delivery of CDRs as set out in paragraphs 7.1 of the Direction. If you do not agree, please provide evidence to support an alternative approach or timeframe.:

We rely on Network Operators providing CDR's to allow us to bill End-Users within the timeframe permitted by the Direction. We support the proposed timeframe described in paragraph 7.3.

This eventuality only covers Usage Events however the billing of Non-Usage Events, especially Non-Usage Recurring Events, to consumers (such as monthly rentals) often relies on the receipt of electronic service orders from Network Operators confirming the successful completion of provisioning (or de-provisioning) requests. The timeliness requirements of the Direction for Wholesale CP's should be expanded to include the provision of records that impact all types of chargeable events.

There should also be no permitted exceptions to the proposed timeframe for the delivery of CDR's as this fundamentally weakens the Direction. Paragraph 7.3 contains a loophole that allows CP's to deliver CDR's late if it is permitted by the contract. If this loophole remains it is likely that late delivery of CDR's will become a standard clause in wholesale contracts emasculating this provision of the Direction to the detriment of Retail CP's and consumers.

Question 5: We invite stakeholders' views on the proposed non-material changes to the Direction?:

On the whole we support the non-material changes to the Direction however we believe the examples provided in paragraph 4.6.3 are unnecessary and can be removed. Paragraph 4.6.3 itself adequately specifies the informational requirements for tariff schedules. It is also in the commercial interest of CP's to ensure consumers understand their bills. The examples subsequently given are too granular and it should be for the Approvals Bodies to ensure that tariff schedules comply with this clause of the Direction.

Question 6: We invite suggestions on these and other ways in which awareness of the Scheme can be promoted.:

A logo for CP's holding an Approval would be a simple way of promoting awareness of the scheme.