

Response from Daisy Group

- Cost of Implementation – We believe it is important for Ofcom to understand exactly what the cost implications are for signatories to the code. For Daisy, the monitoring and recording of contention and peak time speeds and the associated development work will push the cost of implementation into the hundreds of thousands of pounds range. This is a serious investment for all ISP's and I believe this demonstrates commitment to the code. I can confirm that Daisy are intending to sign up to the revised code, however, a thorough review of our base is needed to understand the exact figures involved.
- Implementation Date – With the above in mind, Daisy believe that ISP's should be given 12 months to implement the changes, as a minimum! We would propose a January 2019 implementation date. This ensures that ISP's have enough time to budget for, develop and test all necessary components. We believe that a shorter timeframe would force a rushed implementation which would not serve the purposes of our customers.
- Under clause 2.74 of the revised code, the terminology used does not stipulate that an upgrade to a more expensive product – FTTC instead of ADSL for example – should be offered at no additional cost to the customer. Daisy would propose this is slightly reworded to remove the ambiguity. There should also be room for ISP's to review the offer from a commercial standpoint i.e. to weigh up the cost of providing the more expensive product against the cost of allowing the customer to exit.
- Under clause 2.79(b), Daisy understands that this is part of the current code and understands the rationale behind the decision to include VOIP as a 'dependent service'. That being said, there is still an area of contention around this as Daisy feel that a VOIP product is dependent on a broadband product but not the specific broadband product being ceased. The customer is able to transfer the broadband service to another provider and the equipment will still work. For example, Daisy may sell a 50 handset VOIP deal where around £7000 cost is spent in provisioning and delivering the service, where a customer may experience slow speeds (that may or may not impact the usage of the VOIP system) and be allowed to terminate the entire deal. This is a massive commercial hit on the business. As this was established in the original version of the code, Daisy don't want to backtrack into previous issues, we just want to highlight our thinking on this matter.