

Consultation response form

Please complete this form in full and return via email to broadband.speeds@ofcom.org.uk
or by post to:

Celia Pontin
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Consultation title	Broadband Speeds Code of Practice
Full name	David P Barr
Contact phone number	
Representing (delete as appropriate)	Self
Organisation name	
Email address	
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	No

Your response

See below

1.1 Question 4.7: Do you have any comments on the proposed changes to the codes, as outlined in this consultation document (including Annex 1)? Please provide reasons for your response. In particular:

a) Do you agree that the codes should require the provision of speed estimates that reflect peak-time network congestion?

b) Do you agree that the minimum guaranteed speed should always be given to customers at point of sale?

Confidential? – N

This is a very sound idea.

With the current code of practice ISPs advertised a headline speed only achievable on a wired (Ethernet) connection. This is misleading as most users access the internet via mobile devices such as mobile phones and tablets. The new code would allow this abusive approach to continue therefore it is necessary, indeed vital, that an enhanced code should insist that ISPs provide typical speeds in the two environments in common use:

- Wired access
- Wireless access

In this way, the consumer can make a considered decision prior to purchase.

c) Do you agree that, where a customer's speed falls below the minimum guaranteed level, there should be a limit on the length of time providers have to fix the problem before offering the right to exit? Do you agree that the limit should be 30 calendar days?

On the face of it seems a good idea. However, currently ISPs often blame poor performance on environmental factors within the premises and therefore beyond their control. Typically these include brick walls Halogen lamps, electrical dimmer switches, stereo or computer speakers, fairy lights, TVs and monitors and AC power cords. If this list were true there is few households in the UK who can escape the list. So no-one who be entitled to the right to exit.

These so called environmental factors are in the main pure bunkum. There is NO scientific evidence available to support these spurious claims. Focusing in brick walls, most houses in the UK have brick walls yet radio waves from radio station such as those provided by the BBC pass freely through the external and internal walls.

Wi-Fi is simply a trademarked term meaning IEEE 802.11x. The false notion that the brand name "Wi-Fi" is short for "wireless fidelity" has spread to such an extent that even industry leaders have included the phrase wireless fidelity in a press release. Wi-Fi is just a very mundane part of the Electromagnetic Spectrum (EM) just as radio waves are. These pass free through brick (until scientifically otherwise). The main factor affecting Wi-Fi from a wireless router is distance from the router.

Where ISPs offer such excuses, for example to avoid the consumer's right of exit, they should provide suitable scientific evidence in support. Indeed, if this were the case, would it not be good practice to advise the consumer prior to purchase?

<p>d) Do you agree that the right to exit should also apply to a landline service sold over the same line, and to pay-TV services purchased at the same time, as the broadband service?</p> <p>e) Do you agree that the codes should be capable of being applied in full to all standard fixed broadband technologies, including cable and FTTP?</p> <p>f) How long do you consider that signatories should be given to implement the proposed changes following publication of the final version of the codes?</p>	<p>Fully agree</p> <p>Fully agree</p> <p>Six months</p>
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