

*Question 5: Do you agree with our assessment of problem 1: multiple switching processes? If not please explain why you disagree..*

- Page 16: 'Problem 1: Multiple switching processes.'

*Question 7: Do you agree with our assessment of problem 2: Back end systems deficiencies? If not please state why you disagree.*

- Page 17: 'Problem 2: Inadequate systems'

*Question 8: Do you have evidence to suggest that the incidence of slamming has changed significantly? Please provide any evidence you have to support your views.*

- See 'Problem 3: Insufficient customer consent') on pages 17-18. Stakeholders may find it useful to read para 4.107-4.118 of the main consultation document. We would welcome any evidence of the incidence and magnitude of slamming that consumer stakeholders have witnessed (and if possible can evidence) both in the present and over time.

*Question 9: Is there further action you think could be taken to help tackle slamming (e.g. preventative measures to stop it from occurring or enforcement activities after it has happened to act as a deterrent) under the existing processes? Please explain your answer.*

- See 'Problem 3: Insufficient customer consent') on pages 17-18.
- Ofcom has considered an option of strengthening record keeping obligations (paras 6.15 and 6.16 in main consultation document) as a way of protecting against slamming. Stakeholders may wish to also read these paras in formulating their responses to this question and in relation to question 17 below.

*Question 17: Do you think strengthening record keeping obligations for consent validation would increase protection against slamming? Would this be adequate to safeguard consumers now and in the future? Please explain your answer and provide any supporting evidence.*

- See explanation to Q9 above.

*Question 10: Do you think it would be more appropriate to introduce stronger upfront consumer protections within the switching process or continue with the current reliance on enforcement to tackle slamming? Please explain your answer.*

- This question essentially asks respondents to express an opinion regarding whether we should introduce improved upfront protection as a guard against slamming i.e. require consent before the switching process can begin, or continue with current processes and rely on enforcement activity to deter slamming.

*Question 11: Do you agree with our assessment of Problem 3: Insufficient customer consent? If not, please explain why you disagree.*

- See 'Problem 3: Insufficient customer consent' on pages 17-18.

*Question 12: Do you agree with our assessment of Problem 4: Lack of awareness of the implications of switching? If not, please explain why you disagree.*

- See 'Problem 4: Lack of awareness of the implications of switching' on pages 18-19.

*Question 13: Do you agree with our assessment of Problem 5 Unnecessary switching costs/hassle? If not, please explain why.*

- See 'Problem 5: Unnecessary switching costs/ hassle' on page 19.

*Question 14: Are there any other key problems with the existing Notification of Transfer and Migration Authorisation Code processes that we have not identified? Please provide evidence to support your answer.*

- This question is asking respondents to consider whether we have captured all the key problems identified in the section titled, 'Problems with the current switching processes' on pages 16-21.

*Question 18: Do you think that the introduction a requirement to include specific information about early termination charges (ETC) and/or minimum contract periods (MCPs) in bills should form part of the enhancements to the current NoT process? What are the likely costs and benefits of such an approach? Please provide any evidence to support your answer.*

- Stakeholders may wish to refer to para 6.17-6.18 of the main consultation document. Essentially this question is trying to assess whether there are other more effective enhancements that can be made to the current NoT switching process.

*Question 23: Are there any particular data protection and/or privacy related issues that you think would need to be considered under the GPL TxC and/or the GPL TPV options? Are these issues likely to be significantly different to the issues that need to be considered under the current processes? Please explain your answer.*

- Para 6.41-6.43 of the main consultation document. Both of these options would rely on a centralised database that would include information on name, address and postcode for all customers, which can only be used for purposes of switching. The providers already hold this data and are currently obliged to process it in accordance with the Data Protection Act (using data in a fair and lawful manner and ensuring data is kept secure) – this would continue to be the case.

*Question 24: Are there circumstances in which you can envisage that consumers would be likely to be distressed and/or harmed by the sharing of their personal data as required under the GPL TxC and/or the GPL TPV options? Do you think that consumers will object to the sharing of their data in this way? Please explain your answer.*

- Para 6.41 – 6.43 of the main consultation document. This follows on from Question 23 above.

*Question 41: Do you agree with our assessment that the TPV option should be preferred to the USN option. If not, please provide your reasoning.*

- A comparison of the options and conclusions is presented between pages 24 - 29. The TPV and USN options are directly compared on page 28.

*Question 44: Do you have any other comments on our option assessment?*