

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1:Do providers support (i) each of the different order type processes (ii) Linked Orders (iii) Parallel Orders processes? Where providers do not support each of these individual processes, please explain why you think this is the case? Please provide evidence to support your view:

No. Currently I do not feel that the service provider's are providing consumer's with enough information about the different methods of transfer processes. This information clearly should be clearly published alongside their pricing information. Specifically with with regards to MAC codes, I feel that this should be provided in less than 5 working days.

Question 2:Are gaining providers currently able to correctly advise consumers at the point of sale on the correct switching process to follow (e.g. do agents have access to and the ability to use Dialogue Services and have

access to information on which technology will be used to supply the service to the customer)? Please provide any evidence you have to support your views. :

No. The gaining provider/sales agent's do not appear very knowledgeable about the transfer process and are keen on pushing a sale through rather than explaining the transfer processes to the consumer.

Question 3:Do you agree it will become more difficult for Gaining Providers to advise consumers at the point of sale on the correct switching process to follow as new technologies or new combinations of existing technologies are rolled out? Please provide any evidence you have to support your views:

Definitely making it more difficult and it is complicated. Most Service Provider's appear to have different parameter's and different specifications and no two companies appear to have the same. process.

Question 4:Do you agree there is lack of competitive neutrality from having multiple processes? Please provide any evidence you have to support your views.:

Neither agree nor disagree.

Question 5:Do you agree with our assessment of Problem 1: Multiple switching processes? If not, please explain why you disagree.:

Yes I agree.

Question 6:Do you agree that the current switching processes are likely to become less reliable in the future? Please explain your answer and provide any evidence you have to support your views.:

Yes I agree.

Question 7:Do you agree with our assessment of Problem 2: Back end system deficiencies? If not, please state why you disagree:

I was not aware of these problems, but I agree and understand that these can cause difficulties and transfers processes on both the gaining/losing provider side should be streamlined and consumer's should be made aware of this.

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:

I've never personally experienced an slamming incident. However if this is happening to consumers', then I think the provider's should put more steps in place to make sure this doesn't happen. Ever. If it does occur, the onus should be on the provider to resolve and reimburse any costs.

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.:

Provider's need to take extra care, they should mention the possibility of slamming during point of sale to ensure consumer's/sales agents alike can work together to help minimise this problem. Also consumer's should be recompensed if they have experienced slamming....

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.:

I feel there should be stronger upfront consumer protections in place giving consumer's more rights as this feel somewhat unbalanced.

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

Yes I agree. There should be more information on the switching processes and less emphasis on tariffs/prices.

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. :

Yes I totally agree with all of Problem 4. Any pitfalls that may occur should be made clear to the consumer and I do not feel that termination fees should be applied.

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

Yes, absolutely.

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:

No.

Question 15: Do you agree with our assessment that a prohibition on reactive save activity under the LPL process would be difficult to enforce effectively? Can you suggest how enforcement of a prohibition on reactive save may be made effective:

No comment.

Question 16:Are there other enhancements that you think should be included in the Enhanced NoT specification to help protect consumers both now and in the future? Please explain your answer and provide any supporting evidence.:

No comment.

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.:

Yes.

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:

Yes.

Question 19:Do you agree that Cancel Other call recording obligations should not form part of the Enhanced NoT model? What are the likely costs and benefits of introducing Cancel Other call recordings? Please provide any evidence to support your answer(s).:

No comment.

Question 20:How can Ofcom best address competition concerns relating to reactive save activity through enhancements to the MAC process? What are the likely costs and benefits of such an approach? Please provide any evidence to support your answer.:

Yes, I agree reactive save activity damages competition and Ofcom should make sure that the service provider's losing/gaining should inform consumer's of reactive save.

Question 21:Are there any particular issues that you think would need to be considered in establishing the hub and database under any of the GPL options (e.g. general practicability setting up and/or ongoing operation)? Please explain your answer. :

Question 22:Do you agree that the GP staying on the TPV call should not be a mandated part of the TPV model? Do you think there are significant benefits from the GP closing the call with the customer after the TPV conversation? Please explain your answer(s) and provide any supporting evidence. :

Yes I agree, it would reassure me as a consumer that the sale is impartial.

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. :

Yes I think there could be data protection/privacy issue as a result of TPV and as such they should only request information that is required to complete the transfer order.

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:

As long as it's made obvious to consumer's that TPV will take place, i think it would help rather than hinder transfer processes.

Question 25:Are there any particular issues that you think would need to be considered in terms of the practicalities involved in setting up the TPV body and its ongoing operation under the GPL option? Please explain your answer.:

Costs will/should be taken consideration

Question 26:Are there any particular issues that you think would need to be considered in terms of the practicalities involved in setting up the Transfer Code Issuing Authority and its ongoing operation under the Losing Provider Led options? Please explain your answer:

No Comment.

Question 27:Do you agree with the proposed specifications for each of the options? If not, please specify what changes you consider should be made to the specifications and the basis for this. :

Will send response in writing.

Question 28:Are you able to provide an estimate of the time it would take to make the necessary changes to your systems and processes to implement each of the options? Please explain your answer.:

Will send response in writing.

Question 29:How could the switching process options be used (or amended) to support the WLTO process to deal with the problem of ETs in the context of a homemove? Please explain your answer. :

Will send response in writing.

Question 30:Do you agree with our assessment of the options regarding multiple switching processes? If not, please explain why you disagree.:

Will send response in writing.

Question 31:Do you agree that the Options 2b (GPL TxC) and 2d (TPV) are likely in practice to deal effectively with homemove ETs? Can you foresee any problems with adopting this process for homemoves? Please explain your answer.:

Will send response in writing.

Question 32:Do you agree that the Option 2c USN and Options 3a-b LPL TxC and LPL ALT are unable in practice to deal with homemove ETs? If not, please explain how these options could be used to deal with homemove ETs? :

Will send response in writing.

Question 33:Do you agree with our assessment of the options regarding back end processes? If not, please explain why you disagree.:

Will send response in writing.

Question 34:Do you agree with our assessment of the options regarding consumer consent? If not, please explain why you disagree.:

Will send response in writing.

Question 35:Do you agree with our assessment of the options regarding the implications of switching? If not, please explain why you disagree:

Will send response in writing.

Question 36:Do you agree with our assessment of the options regarding unnecessary switching costs/hassle? If not, please explain why you disagree.:

Will send response in writing.

Question 37:Do you agree with our assessment of the options regarding reactive save activity? If not, please explain why you disagree:

Will send response in writing.

Question 38:Do you agree with our assessment of the options regarding reactive save activity? If not, please explain why you disagree:

Will send response in writing.

Question 39:Do you think that the payment of a TPV fee for each sale is likely to be a significant barrier to entry for smaller CPs? Please provide any supporting evidence.:

Will send response in writing.

Question 40:We welcome stakeholder views on whether the additional cost of the TPV option over the GPL TxC option is justified due to the superior protection against slamming? :

Will send response in writing.

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. :

Will send response in writing.

Question 42:Do you agree with our assessment that the TPV option is pro-competitive relative to the LPL TxC option? If not, please explain why you disagree.:

Will send response in writing.

Question 43:Do you agree that the TPV is the most proportionate way to deal with the problems identified? If not, please provide your reasoning.:

Will send response in writing.

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

Will send response in writing.