

Your response

Question 1: Do you agree with our proposed principles and methods for assessing the number of UK users of a TSS?	<p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] in our experience, determining the exact number of users of a particular TSS can be very difficult, particularly given the myriad of ITEs in any individual household, many of which may not be in active use.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>We suggest setting a percentage threshold that needs to be reached before providers become regulated. The thresholds can be calculated based on either of the following:</p> <ol style="list-style-type: none">1. The number of ITEs the provider has shipped in the UK as a proportion of <u>all</u> ITEs shipped per year in the UK; or2. The number of the provider's currently active ITEs in the UK as a proportion of <u>all</u> active ITEs in the UK. This number can be collected by requiring providers to report to Ofcom the number of active devices they have tracked. <p>[REDACTED]</p> <p>[REDACTED]</p>

Question	Your response
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<p>Question 3: Do you agree with our proposed principles and methods for assessing the manner of use of a TSS?</p>	<p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] the proposed principle and method of calculating the extent of active use of the TSS may become complex without determining what truly constitutes 'active' – see also our response to Supplemental Question 2. We propose adopting the industry standard measurement of Monthly Active Users (MAU), where: (i) the time period measured is one month; and (ii) 'active' would then be defined as an ITE connecting to the internet at least once during that measured period upon the instigation of the user (i.e. other than automatically, for example to receive an automatic update).</p>
<p>Question 4: Do you agree with our proposed principles and methods for advising on the functions that a TSS is capable of carrying out, or may be made capable of carrying out?</p>	<p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>When applying the legal framework to decide whether a TSS is capable of functioning as an RTSS, the context of the different business models used by various operating systems in the market should be kept in mind. [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

