

<p>Question 1: Do you agree with our provisional analysis of whether our rules which facilitate access to ADR are meeting our objective?</p>	<p>We agree that reducing the timeframe would be beneficial, that 6 weeks is an acceptable timeframe, and that 4 weeks would be too short a timeframe to deal with a dispute. Also, we agree that adding an additional ADR provider for CPs to choose to use – in addition to CISAS and the Communications Ombudsman – and who would be regulated in the same way and following the same rules would be beneficial.</p>
<p>Question 2: Do you agree with our proposal to modify the GCs to reduce the timeframe for access to ADR to 6 weeks?</p>	<p><i>Please indicate whether this is a red line and/or unfairly costly for your business, and if so, how this will impact you.</i></p> <p>We agree that reducing the timeframe to 6 weeks will provide a fairer outcome to consumers, and completing a dispute within the proposed timeframe is achievable. In the majority of cases, we find that the need for ADR is not necessary, and we have a limited number of cases that run beyond six weeks. Where we cannot resolve a complaint within six weeks, we agree that it would be in the best interest of the consumer for a third party to assist with resolving the dispute.</p> <p>We do not feel therefore that this would cause a negative impact on our business or cause any reputational or financial impact.</p>
<p>Question 3: Do you agree with the findings of our provisional impact assessment?</p>	<p>We agree that with stronger regulation of the ADR providers by Ofcom and clear guidelines for resolution this should ensure that this remains fair. Additionally, we agree that adding a 3rd ADR provider to the process for CPs to choose would be beneficial.</p>
<p>Question 4: Do you agree with our proposed implementation period?</p>	<p><i>Please indicate whether this is a red line and/or unfairly costly for your business, and if so, how this will impact you.</i></p> <p>We are supportive of the proposed implementation period. 6 months should be sufficient time to make the changes required by both ADR providers and ISPs.</p>
<p>Question 5: Do you agree with our provisional assessment and proposal to re-approve both schemes based on the approval criteria set out in the Act? Please provide your reasoning.</p>	<p><i>Please indicate if you feel the schemes are not fit for purpose, and if so, why.</i></p> <p>We support the proposal to re-approve both the existing schemes providing that the rules are agreed and clearly implemented by both providers.</p> <p>The response guidelines for both schemes should be more consistent as highlighted in the Ofcom consultation document, for example.</p> <ul style="list-style-type: none"> • A consistent compensation amount (if awarded) by the ADR provider should be set to ensure that there are no differences and that the scheme is fairer for consumers and CPs. • Appeals and the right to appeal a decision should be consistent between providers. • CPs should be fully aware of the outcome of complaints and be part of regular reviews to ensure learning for better outcomes.
<p>Question 6: Do you agree with our proposed changes to the decision-making principles? Please provide your reasoning.</p>	<p>We agree with the proposed changes to decision making principles with the focus on fairer outcomes for consumers and a level playing field for providers:</p> <ul style="list-style-type: none"> • <i>Independence • Fairness • Impartiality • Openness • Transparency • Effectiveness • Accessibility • Consistency • Measured performance • Official Approval • Accountability</i>

	<p>Ensuring a balance between the treatment of the CP and consumer is key for success, as long as both sides are balanced and monitored and that consistent information is provided on both sides this should result in better outcomes for all.</p> <p>Additionally for compensation – transparent/published policies on awarded amounts and guidelines should be available and consistent between providers.</p>
<p>Question 7: Do you agree with our proposed changes to the KPIs including the proposed implementation period? Please provide reasons.</p>	<p>The following are KPIs for ADR providers:</p> <ul style="list-style-type: none"> a) More than 85% of calls to be answered in less than two minutes. b) More than 95% of calls to be answered in less than five minutes. c) 90% of digital correspondence to be replied to within 3 working days. d) 100% of written correspondence to be replied to within 10 working days. e) More than 95% of case decisions reached within 6 weeks of the case being accepted. f) Less than 1% of case decisions to be issued later than 8 weeks after the case has been accepted <p>We agree with the KPIs above and that enforcing these and reporting compliance (without focus on the main providers) will encourage a fairer and more consistent approach to dealing with consumers generally, and with any complaints and disputes raised.</p>