

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our provisional analysis of whether our rules which facilitate access to ADR are meeting our objective?</p>	<p>Confidential? – N</p> <p>We agree with Ofcom’s analysis that the existing rules work well to achieve the objective of increased consumer awareness of ADR. We also agree that the existing rules satisfy Ofcom’s duty under section 52 of the Act to secure that Communication Providers (“CPs”) establish and maintain complaints handling and dispute resolution procedures that are easy to use, transparent, non-discriminatory and effective.</p> <p>However, we do have some concerns in relation to reducing the timeframe before consumers can access ADR from the current 8 weeks to 6 weeks, see our response to question 2 below.</p>
<p><b>Question 2:</b> Do you agree with our proposal to modify the GCs to reduce the timeframe for access to ADR to 6 weeks?</p>	<p>Confidential? – N</p> <p>As we outlined in our response to the call for inputs, we don’t believe that reducing the existing 8-week timeframe is the right thing to do for the following reasons:</p> <ul style="list-style-type: none"> <li>i) Complaints that reach the ADR stage of a complaints procedure are often complex and take time to fully review and resolve with the customer. A shorter timeframe would not allow enough time for CPs to resolve the complaint before it escalates to ADR.</li> <li>ii) A reduction to 6 weeks would mean that complaints may reach ADR before they need to, which may extend the length of time it takes for a customer to receive a resolution. Complaints that rely on third parties to resolve or complaints that take 2 billing cycles to rectify are two examples of this.</li> <li>iii) We believe the volume of complaints that the ADR schemes have to deal with would increase significantly if the timeframe was shortened. Unless additional resource is provisioned by the ADR schemes the quality, speed and length of time to reach a decision may be impacted. This will make it difficult for ADRs to achieve their KPIs.</li> </ul>

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	<p>iv) We are a multi-service provider, and a 6-week timeframe is not in-keeping with other regulated industries such as financial services, energy and water.</p> <p>As explained in our response to question 1 above, we consider that the existing rules already work well to ensure that CPs' complaints handling and dispute resolution procedures are easy to use, transparent, non-discriminatory and effective. Specifically, the rules set out at GC C4.3 and paragraphs 11 to 13, 9(b) and 26 of the Code which mandate that:</p> <ul style="list-style-type: none"> <li>i) all providers are a member of an Ofcom-approved ADR scheme; and</li> <li>ii) all providers signpost consumers to ADR when they become eligible; and</li> <li>iii) providers include information on ADR in bills and when telling consumers about the outcome of an investigation into a complaint.</li> </ul>
<p><b>Question 3:</b> Do you agree with the findings of our provisional impact assessment?</p>	<p>Confidential? – N</p> <p>Yes, we agree in principle with the findings of your provisional impact assessment.</p>
<p><b>Question 4:</b> Do you agree with our proposed implementation period?</p>	<p>Confidential? – N</p> <p>Yes, despite not agreeing with the proposal to reduce the timeframe to 6 weeks, we agree with the proposed implementation period should this come to fruition.</p>
<p><b>Question 5:</b> 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>Confidential? – N</p> <p>Yes, we agree with your provisional assessment and proposal to re-approve both schemes.</p>
<p><b>Question 6:</b> Do you agree with our proposed changes to the decision-making principles? Please provide your reasoning.</p>	<p>Confidential? – N</p> <p>Yes, we agree with your proposed changes to the decision-making principles.</p>

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<b>Question 7:</b> Do you agree with our proposed changes to the KPIs including the proposed implementation period? Please provide reasons.	Confidential? – N Yes, we agree with the proposed changes to the KPIs.

Please complete this form in full and return to [ADRreview@ofcom.org.uk](mailto:ADRreview@ofcom.org.uk)