EE response to Ofcom's consultation 'Accreditation Scheme for price calculators'

EE welcomes the opportunity to comment on Ofcom's consultation 'Accreditation Scheme for Price Calculators'. Since the introduction of the scheme in 2006, there are currently six accredited websites which do not all cover fixed, broadband and mobile services. A quick search on Google returns at least 20 other (non-accredited) price comparison websites (PCWs).

In their overview of the scheme Ofcom set out that accredited PCWs themselves did not consider accreditation resonates significantly with the consumer using their sites; consumers do not know about Ofcom or their role. When the new scheme was introduced in 2006, one of its objectives was to promote consumer awareness of accredited PCWs. In this respect we are interested to find out how consumer awareness of these accredited sites has developed over time, and how this compares to consumers' awareness of non-accredited sites. In addition, the Consumer Focus research into the reliability and transparency of PCWs showed that both accredited and non-accredited PCWs provide accurate information in a clear and transparent way. This begs the question whether there is any additional value in accredited PCWs over non-accredited ones.

Q1 Do you agree with Ofcom's conclusions that there is no need for a fundamental revision of the Scheme at this time?

The consultation document does not address the question whether there still is a need for accredited PCWs or whether consumers are satisfied with current non-accredited websites, and the quality they offer. The consultation sets out that accreditation does not resonate with consumers, and that both accredited and non-accredited websites provide accurate information. We are interested to get Ofcom's views on the ongoing need for accreditation in this area.

Q2 Ofcom is proposing to revise the approval requirements with respect to the provision of information on Quality of Service metrics. Are there other aspects of the scope of the Scheme that we should revise?

EE have commented on Ofcom's consumer information policy on numerous occasions. We believe Ofcom should take a more holistic approach to consumer information, and assess which information is important and relevant for customers at which stage in their contract and what the best medium is for providing such information. This consultation, again, feels like a 'more is better' approach to information and is not underpinned by any consumer research in this area.

Apart from our response under Q1, we believe that a revision of the scope of the information to be provided by accredited PCWs should be driven by consumer demand. Ofcom sets out that additional measures 'may be helpful' but haven't demonstrated whether there is actual demand for that type of information, and whether the PCWs would be the best channel for this information.

Q3 Ofcom is proposing to revise five areas around the operation of the Scheme. Are there any other aspects that we should revise?

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Q4 Ofcom is proposing to include a requirement in the approval criteria that PCWs include in their results pages for broadband comparisons clear messaging on speeds, and provide information about Ofcom's comparative information and about online speed checkers. Do you agree with these proposals and our analysis of their impact? Please give reasons and if appropriate state alternatives.

We do not believe it is appropriate or necessary to introduce additional requirements to standardize the PCWs' approach on broadband speeds. In this section in general, Ofcom have not demonstrated that consumers have a need for any of the information set out in options 2, 3 and 4 to be included in these websites.

In terms of option 2, providing clear messaging on broadband speeds, Ofcom state that a number of accredited and non-accredited PCWs are already providing information regarding speeds, which makes us question what the additional value is of requiring accredited PCWs to do so. The same applies to option 3, providing a link to Ofcom's work on broadband speeds, on a website's general / background page. We question whether this information will actively be used by a large number of customers.

As regards option 4, providing information about the ability to check the line speed, we question whether a comparison website is the best place to promote the use of line speed checkers. Speed line checkers are widely advertised and available through websites and apps. Customers interested in checking their line speed will have no trouble finding any, and will not necessarily use comparison websites as a starting point for checking their line speed.

Q5 Ofcom is proposing to amend the approval criteria so that PCWs providing broadband comparisons give details of any data usage limits on the results page. Do you agree with these proposals and our analysis of their impact? Please give reasons and alternatives where appropriate.

We do not agree with these proposals. Again, Ofcom fails to demonstrate there is a consumer need for this information to be included on CPWs. ISPs are already under an obligation to be transparent about usage caps and traffic management policies under the Transparency Code and have, on their websites the relevant information which is easily accessible and comparable. In our experience, not all customers are interested in traffic management information, and those who are can find this information through the ISPs' KFIs.

Traffic management policies are not straightforward to explain to consumers, especially since the impact of traffic management practices is only one factor that can influence a consumer's experience of their broadband service. Summarising these policies, and not putting them into a wider context could lead to PCWs mis-interpreting and misrepresenting this information, if Ofcom placed an obligation on them to include general traffic management information.
In addition, we believe that PCWs, whether accredited or not, would include this information, if their customers had indicated they would be interested in this type of information.

Q6 Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information about traffic management policies. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.

See our response under Q5.

Q7 Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information and a link to Ofcom's comparative customer service and complaints information. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.

Again, we question whether large numbers of customers would use this type of information, especially when included on a general / background page. Most PCWs are driven by commercial objectives, and will provide certain information if they believe their customers need such information. The fact that this has not happened could indicate that customers, at that stage in their search process, are perhaps less interested in this information. In addition, Ofcom complaints information contains complaints data of the 4 big ISPs only, leaving out many of the smaller players. Ofcom's complaints data should also be qualified in the sense that it contains only complaints from customers who are aware of Ofcom, that numbers are relatively low, and that only limited conclusions could be drawn using this information.

Q8 Ofcom invites views on our proposals to publish guidance on past decisions and to carry out quarterly spot-checks. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.
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Q9 Ofcom is proposing to modify the charging schedule to the effect that companies or other entities with two full-time equivalent employees can benefit from the lower charges. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.
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Q10 Ofcom invites views on any additional publicity that Ofcom should be giving to the Scheme and accredited PCWs and on any changes to the Scheme logo we should consider.
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Q11 Ofcom is proposing to require accredited PCWs to have a complaints handling process in place, which shall be clearly set out on their websites. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.

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