

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want 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

Additional comments:

Question 1: Do you agree with Ofcom's conclusions that there is no need for a fundamental revision of the Scheme at this time?:

No, the current scheme is discriminatory to smaller ISPs and does not require a "Price Calculator Site" to make available its service on an equal playing field to the entire market leading to distortion.

Question 2: 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?:

Yes, explicit inclusion for the support of IPv6 and/or Carrier Grade NAT should be made so that end users are aware of the limitations of the service that are imposed.

Question 3: Ofcom is proposing to revise five areas around the operation of the Scheme. Are there any other aspects that we should revise?:

Since I believe there is a failure in response to Q1 only making minor changes is an inappropriate response.

Question 4: 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.:

These seem proportionate

Question 5: 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.:

Agree that a change is required, however there needs to be a clear indication of both package based "allowances" i.e. accounts that have an explicit data cap *and* those accounts where "Fair Usage" limits could impact an end users experience.

Its no use comparing an UNLIMITED account with a 100G FUP attached against a 200G allowance and assuming that the UNLIMITED version is "better"

Question 6: 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.:

Without forcing CP to provide explicit traffic management policies this change will make no difference. How does a PCW check that the product they are comparing has the correct details otherwise.

Question 7: Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information about 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.:

Yes, but would extend this to include references to which ADR each CP uses and whether they are a member of ISPA (which handles complaints for end users as well)

Question 8: 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.:

Agree

Question 9: 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.:

Agree with a change in the charging structure, would a levy on relevant turnover not be a more reliable method for returning to Ofcom a fair fee?

Then "free" or "community based" sites could off their own approved scheme at a much lower cost

Question 10: 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.:

Agree

Question 11: 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 and giving reasons and alternatives where appropriate.:

Agree