

Title:

Mr

Forename:

David

Surname:

Harrington

Representing:

Organisation

Organisation (if applicable):

CMA

What additional details do you want to keep confidential?:

No

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 that the Direction should continue to apply fixed and mobile voice services (aside from wholesale services and services for large business) and that its requirements should remain unchanged? Please provide reasons to support your response.:

The direction should cover telecoms billing, not just mobile and fixed line. The whole area is complex and more so and the boundaries are blurring

Question 2: Do you agree that encouraging, but not mandating, the inclusion of data services in the Scheme represents the best way of protecting the users of those services from inaccurate billing?:

Why should some of the most complex services be subject to least rigor?

Question 3: Do you agree that the provisions on data billing in Annex D of the Direction should be reviewed and updated? Please identify any issues that you believe the review should consider.:

Q3 How do you separate data. Especially if it is part of a "telephony bill" or bundle. Is text voice, or data etc?

Question 4: Do you agree that the scope of the scheme should continue to apply to large businesses? Please provide evidence for your views in particular providing evidence on whether large businesses are able to and do monitor their bills more effectively than other consumers?:

As a general comment, customer care level in suppliers are getting poorer, billing is getting more complex and so most consumers, whether as individual customers or large corporates, do not know to what extent they are being ripped off. It is very difficult to provide statistical data to support such subjective views, but the trends are ongoing and consumers look to Ofcom to protect their interests over and above those of the suppliers.

Question 5: Do you agree that with the proposal that error rates and tolerances set in the Direction should not apply in respect of business? What requirements should apply in the absence of error rates and tolerances, if any? :

The tolerance relates to billing accuracy. The accuracy of a bill includes the inventory and rentals, not just calls. These items cause the biggest billing errors and measured against the Ofcom criteria, a large number of bills are in breach of the code.

Question 6: Do you agree with the suggested definition of a large business as having a communication spend in excess of £50K? Please provide reasons and any evidence for any response.:

50k is NOT a "large business spend"!

There is ample evidence in surveys dating back 10-20 years (including those carried out jointly by CMA and Ofcom, which identifies "large business spend" in the order of Millions. Ofcom's approach to this consultation is merely encouraging the third party Telecom Cost Management market to thrive. This is not a consumer-focused approach..

Question 7: Do you agree with the proposal that wholesale services should be removed from the scope of the Direction? Please provide reasons for your views.:

This is a strange proposal. If the problem is complex and difficult to get right an appropriate response is surely not to sweep it under the carpet or remove it from regulatory control. Simplistically, a bill should be an accurate representation of the services consumed.

Question 8: If wholesale services are removed from the Direction, to what extent should the relationship between retail and wholesale CPs be covered in the Direction?:

Question 9: Do you have any further observations or evidence on the Metering and Billing Direction?:

In summary. This does not address the basic bill/invoice. It is entirely about the error rates on calls. As a customer has no opportunity to check the error rate or the total accumulated effect of errors on a bill, how can they complain to Ofcom if the value is incorrect. If on every bill there was a rating score to give a comfort value of compliance and accuracy, then something has been achieved. The fact there is no meter available is to reason to be inaccurate. A simple rate check calculation and compliant value by each call type will give consumers confidence that the call is rated correctly or within a tolerance value