

Katie Hanson
Consumer Affairs
Second Floor
Riverside House
2A Southwark Bridge Road
London SE1 9HA



TalkTalk Telecom Group PLC
11 Evesham Street
London
W11 4AR

T 020 3417 1000
F 020 3417 1001
W talktalk.co.uk

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Dear Katie

Improving access to electronic communications services for disabled people

I am writing to provide some brief comments on the above call for inputs. I apologise for the slight delay.


TalkTalk appreciates the needs of disabled customers and therefore takes its responsibilities under GC15 very seriously. We agree with Ofcom that the provisions of GC15 generally work well for consumers. We have reviewed with interest the proposed areas for updating or improvement and generally speaking we do feel that they seem sensible. We make the following specific comments:

- (i) We understand Ofcom's reasoning behind the need to update the rules for the provision of accessible contracts to benefit other disabled end users. That said, we are concerned that the term disabled is a very broad one and a provider must be able to understand precisely what is required of them. TalkTalk already provides bills in the usual alternative formats (Braille, large print and audio) and we generally do so to any customer who so requests. We are concerned that broadening the current requirement to other users and other formats can place a disproportionate process and cost burden on a provider. In terms of format, for instance, we are not convinced that a requirement to provide bills in EasyRead format is proportionate given the apparent large costs involved. We would encourage Ofcom to arrange a workshop with industry to allow providers to understand the alternative formats in the market and their intended audience as part of the forthcoming consultation process.
- (ii) We would tend to agree that it is sensible to extend the priority fault repair to broadband services as well although Ofcom needs to consider carefully here what a "fault" means in the context of broadband services. In many instances, it may be difficult to draw the line between a faulty broadband service and one which perhaps is just being slower than normal.

- (iii) Similarly we would agree that it would make sense to extend the third party bill requirement to broadband services as well. As a matter of fact this is something TalkTalk does already by virtue of the fact that we mainly sell a telephony and broadband bundle based on LLU MPF.
- (iv) We can see the logic in extending the third party arrangement to fault notifications as well. One does need to bear in mind though that fixing faults can in some cases have significant cost consequences, e.g. if an Openreach engineer visit is required, and it must be made clear in any revision to GC15 that the provider is able to accept instructions from the third party to incur those costs and charge them to the customer's account.
- (v) We would be happy to consider ways in which providers could regularly inform disabled customers of the products and services suitable for them.

Please do not hesitate to contact me should you have any questions concerning the above comments.

Yours sincerely,



Rickard Granberg
Head of Regulation and Compliance