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What do you want Ofcom to keep confidential?:

Keep nothing 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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

I have focused on the questions I felt most strongly about.

**Question 1: Do you think hassle is a key issue we should tackle in this review?
Please provide an explanation for your answer and any supporting evidence.:**

Question 2: Do you agree there is a lack of clarity about the switching processes that consumers need to go through to switch and this may create a barrier to switching? Please provide an explanation for your answer and any supporting evidence.:

Question 3: Do you think clarity is a key issue we should tackle in this review? Please provide an explanation for your answer and any supporting evidence.:

Question 4: Do you think continuity of service (including unwanted breaks and double billing) is a key issue we should tackle in this review? Please provide an explanation for your answer and any supporting evidence.:

Question 5: Do you think the ability of providers to frustrate the switching process is a key issue we should tackle in this review? Please provide an explanation for your answer and any supporting evidence.:

This is important because it enables providers to raise switching costs. Potentially it also has major effects on entry depending on how selective firms can be in whom they frustrate.

Question 6: Do you think consumers' experience of save activity is a key issue we should tackle in this review? Please provide an explanation for your answer and any supporting evidence.:

Yes - this has the greatest potential for distorting the market and appears relatively simple to remedy.

Question 7: Are there issues specific to either residential or business consumers' experiences of the switching processes that you think we should tackle in this review? Please provide any evidence you have to support your views.:

Question 8: Do you agree with our analysis of switching costs? Please provide any evidence you have to support your views.:

Yes

Question 9: Do you agree with our analysis of save activity? Please provide any evidence you have to support your views.:

Yes. It uses a report I wrote for Ofcom on price guarantees fairly and correctly

Question 10: Do you agree with our analysis around the multiplicity of switching processes? Please provide any evidence you have to support your views.:

I think it is broadly ok, but you could think more about self-selection by consumers. You may also have the necessary data to analyse this further. Do prices differ depending on method?

Are the different groups treated differently in terms of prices and other conditions, including the other forms of hassle imposed? Do you have any way of knowing whether one group has a greater propensity to switch than the other - for example by looking at their switching behaviour in other markets. Research at the ESRC Centre for Competition Policy shows a close correlation between switching in different markets.

Consumers may have preference over the switching methods. Moreover, they may make their choice fully cognisant of the switching procedures.

Prices may reflect the different switching procedures. If the more costly switching procedures have already been reflected in the overall price, then there may be no issue, or the issue involves the regulator deciding how behaviourally challenged those buyers really are.

Question 11: Do you agree with the general switching principles we have identified? Please provide an explanation for your answer.:

yes

Question 12: Do you agree with our proposed tier structure for the general switching principles? Please provide an explanation for your answer.:

Not with respect to slamming which does not really fit. Slamming surely is relatively easy to stop - just impose very harsh penalties where it occurs. This is essentially fraud and should be dealt with by the Trading Standards officers who have very extensive powers.

Question 13: Do you agree with our proposal that the preferred switching approach assuming a ?greenfield? basis is GPL?:

Yes - LPL makes no sense. I do not think that the argument in figure 26 that LPL supports (iii) "awareness" is supported by your analysis. Recall that for the LPL this information is clearly not unbiased since the firm is trying to retain the customer. So not at all clear that more valuable information is provided.

You thereby overstate the benefits of LPL which is reduced to be in dealing with slamming. As pointed out in question 12 above, there are better ways to deal with that.

Question 14: Which of the identified GPL switching options do you support? Please provide an explanation for your answer.:

I would need more time to provide a considered answer

Question 15: Do you have any information or views on the costs of the switching options outlined above? Please provide any supporting evidence.:

Question 16: Do you agree with our proposals and implementation priorities for taking forward our work in relation to existing switching processes?: