

Title:

Mr

Forename:

Ian

Surname:

Marshall

Representing:

Self

Organisation (if applicable):

Email:

IanMarshall.UK@GMail.com

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:

GPL switching can invite slamming.

One way to counter slamming is to require the Gaining Provider (GP) to obtain signed written permission from the new customer.

If a customer accuses a GP of slamming, and the GP cannot provide this evidence, then GP

should compensate the customer fully (arrange the transfer back, refund all excess costs including tariff costs paid by the consumer, customer's time) plus a significant penalty (3 years' mean profit expected from the customer).

Web-based evidence can be forged and would be insufficient.

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.:

Yes.

Losing service providers have an incentive to maximise the hassle of service transfer, whereas gaining service providers have an incentive to minimise this hassle.

The less the hassle, the higher the potential for a more competitive market.

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.:

No, not for me.

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.:

Yes. All other things being equal, clarity should always be sought or encouraged.

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.:

Yes.

Service consumers do not want their service to be interrupted during provider change-overs.

Interruption does not happen for electricity and gas supply. This is good.

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.:

Yes.

Obviously, losing service providers have an incentive to frustrate the switching process.

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.:

I do not know what "save activity" is.

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.:

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

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

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

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

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

Yes.

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