

Title:

[✂]

Forename:

[✂]

Surname:

[✂]

Representing:

Organisation

Organisation (if applicable):

[✂]

Email:

[✂]

What do you want Ofcom to keep confidential?:

Keep name confidential, Keep organisation confidential, Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Please keep question 13 confidential.

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:

Yes

Additional comments:

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, consumers should be able to switch in as hassle-free of a manner possible. This empowers consumers with the maximum amount of freedom in choosing telecom providers.

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.:

Currently, the switching process varies among different providers, resulting in some processes that are clearer than others. By creating a uniform process on customer switching, the consumer is better positioned to understand their obligations and avoid any negative consequences of the switch.

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. Creating a uniform protocol for customer switching will certainly lead to clarity in the process.

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.:

In the current system, a glitch in communication between the GP and LP leaves room for error. A simplified switching process will lead to a decreased likelihood that customers will experience a disruption of service. Therefore, it is important that OFCOM tackle the issue of continuity of service in this review.

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. By implementing a gaining-provider led strategy for customer switching, driven by third party validation (TPV), the ability for providers to frustrate the switching process should be virtually non-existent.

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.:

Although save activity is an issue of importance, it may be best to implement the GPL customer switching process with a TPV and gauge whether consumer complaints regarding aggressive save activity practices increase significantly.

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.:

We recognize that business customers run the risk of losing revenues in the event that the switching process goes awry. As a provider, we want to ensure that all of our customers experience minimal hardship, but we are particularly sensitive to the potentially negative impact on our business customers. Any impediment that LPs establish on switching business customers should be analyzed under greater scrutiny.

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

Yes. By subjecting all providers to one uniform policy on switching costs, customers will benefit from increased transparency and will achieve the goal stated in your consumer summary or promoting competition by reducing any unnecessary barriers.

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

Yes. As previously stated, it may be a more effective to address the need for a uniform GPL customer switching protocol in this review and tackle save activity in a subsequent review, save the need to set stringent timelines under which the LP can engage in save activity.

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

Yes. We are in full support of creating a uniform switching process as a means of maximizing competition by reducing any unnecessary barriers to entry my new market entrants, which will ultimately serve to the benefit of consumers.

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

Yes. We agree that minimizing switching costs and supporting competition are at the heart of this study and should remain as the ultimate goal.

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

Yes. We agree that the tier structure is logical. OFCOM has identified the issues that require more immediate attention, and the tier structure addresses those most immediate concerns.

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

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

Option 1c is the ideal. As mentioned in the summary, it has proven successful in other European countries and in the US, the potential for slamming becomes minimal, consumers enjoy maximal clarity, thus achieving, most, if not all, of the stated objectives of this review.

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

By providing a uniform cost structure (administered by a TPV) for switching providers, consumers will have the benefit of maximum transparency in the switching process.

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

Yes. We believe OFCOM's rationale throughout this review aligns the interests of the consumers with that of the providers.