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What do you want Ofcom to keep confidential?:

Keep none of the response 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:

Telecom Yorkshire is proud to say that it believes it has one of the fairest pricing and contractual models currently available in the UK and can see that making billing, supply and provision as clear and possible to the Customer can only be a good thing. However by

making the transfer of services easier must also include protection from what is now known as "slamming";

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, Many consumers are too scared to move their service due to the lack of support and willingness my many of the service providers. The use of a MAC is a good idea but the issuing of such is in the wrong hands.

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.:

Yes, Many consumers feel that it is a simple task to move their services and do not understand the implications of moving from one provider to another especially when they have been moved to an LLU supplier.

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.:

Clarity is one issue and also time taken to issue MAC and hidden costs / penalties. We fully disclose ALL our costs including the cease line fee prior to taking on any customer. We have lost customers due to being open and they have taken a company who's penalties are higher but not disclosed.

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.:

Continuity of service is important to business users however due to the structure of the network and the chaos of the market continuation will be very difficult however providers should sign up to an agreement of minimum downtime. Overlap billing can happen especially where customers are billed in advance for services, but the refunding of the money should not be a delayed process.

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, many providers force customers to apply in writing for their MAC codes delaying the process extensively. Also where suppliers do accept the request by telephone there is a long delay in the issue of this. There should be a restriction on the time to provide a MAC address. Say 72 hours.

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.:

????? Save activity? sorry not sure what this 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.:

Yes, Termination costs and breaking contract costs. We have had Customers who cannot move due to the costs involved even when out of contract many Customers face charges to move from an LLU provider. These charges are around £50.

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

Yes, Switching costs are too high. we only pass on the cost enforced on us by the network . many providers load these costs for leaving so the Customer is hit twice.

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

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

You analysis is correct however actual experience can never be shown in a process flow.

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

Where the Customer has been issued with a MAC and the LSP is compliant then it has been fine. We have found Customers receiving massive bills once the move has been completed. sometimes many months after the event.

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

Yes, but application of these principles needs to be clarified. a code of conduct

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

GPL sounds fine and looks like it will be the same as the current moving of a line. however both the move of a line and GPL on internet needs a better control mechanism to prevent slamming.

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

I think the NOT option looks best as it lines up with the existing practice for voice lines. However there is still no mechanism for the prevention of slamming. Something the customer supplies should be able to authorise the process.

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

I think the NOT process will fit within current processes and should mean a minimal reconfiguration of interfaces. We have a full web based platform that allows us to complete these task and I am sure can be applied to internet lines.

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

I think that the current market and selling needs a complete overhaul and that Customers should have a clear understanding of both the processes and costs involved. Customer are not clearly shown the implications of how things are billed to them or the hidden costs. Many telcos offer 1p per minute calls to Customers. But customers are not told that it is billed by the minute with a set-up call. so a 30 second call can actually cost in excess of 1p! this is not fair and clear charging information should be provided.

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