

T-Mobile UK

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10 June 2010

Rachel Bennett
Ofcom
2A Southwark Bridge Road
London
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Dear Rachel

RE: Metering and Billing: Consultation on the appointment of Enigma QPM Ltd as an Approval Body and a modification to General Condition 11

This response is being submitted on behalf of both T-Mobile and Orange. We welcome the opportunity to respond to Ofcom's consultation on the appointment of Enigma QPM Ltd as an Approval Body and the proposed modification to General Condition 11 ("GC11").

We fully support Ofcom's Metering & Billing Scheme where it is cost-effective, workable and brings benefits to customers. We have always stated that the overriding objective of the metering and billing scheme should be that there is complete confidence in the accuracy of bills and we remain totally committed to ensuring that our customers are accurately billed. Given the high levels of switching in the UK, it is in our commercial interests to continue to keep our customers satisfied.

The introduction of another independent Approval Body into the Ofcom Metering and Billing Scheme is welcomed because it increases competition and choice for communications providers and introduces a fresh perspective into the operation and interpretation of the requirements.

In the past we have argued that Approval Bodies should not be named in GC11 because it would require a modification to GC11 each time a new Approval Body is introduced into the scheme. We accept that this happens infrequently however, we still believe that "Approval Body" should be defined as "an organisation that is certified to approve a Communication Provider's Total Metering and Billing System in accordance with the Direction...."

If you have any questions please don't hesitate to contact me or Clare Seabourne.

Yours sincerely



Gulistan Moledina

Regulatory Manager (T-Mobile UK)

cc Clare Seabourne (Orange UK)