



Lucy Wicksteed  
Floor 6  
Strategy and market Developments  
Ofcom  
2a Southwark Bridge Road  
London  
SE1 9HA

Our ref- Ofcom Review of QOS phase

1

Dear Sirs,

This letter contains Post Office Limited representations in respect of the Ofcom consultation: Review of quality of service information phase 1: Information on quality of customer service.

Post Office Limited (a wholly owned subsidiary of Royal Mail Group) is the operator of the network of Post Office branches. Post Office branches provide a range of essential services including HomePhone and Broadband for residential customers, posting letters and postal packets, pension and benefit payments, banking facilities and bill payments. Many of these services provide essential support for the socially excluded.

Post Office Limited HomePhone and Broadband services are supplied on a fully managed basis; meaning that although Post Office Limited owns the customer relationships with subscribers, the underlying service delivery infrastructure is provided by a third party.

Post Office Limited welcomes the opportunity to respond to Ofcom's consultation regarding the Review of quality of service information phase 1: Information on quality of customer service, as it is clear that the current scheme operating under the name of "TopComm" is not fit-for-purpose.

Indeed, Post Office Limited suggests that Ofcom should forbear the current obligation until such time as a new scheme can be agreed upon and initiated.

Post Office Limited entirely agrees with Ofcom that consumers are fully entitled to information that would help inform them when choosing which telecommunication service to purchase, and that information regarding quality of service should be readily available. One result of the current scheme is that the less a service provider promises its customers in regard to quality of service, the better its TopComm results may appear; and it is generally flawed, open to misinterpretation,

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



and ultimately does not meet the strategic aspirations of Ofcom in regard to the policy aim of the requirement.

Clearly, any information in regard to quality of service should be robust, unambiguous and representative of what consumers want and need in order to help them make a fully informed choice as to which Service Provider is right for them. To that end Post Office Limited suggest that the scheme under which the information is gathered and published be managed by Ofcom with input from Stakeholders.

Here follows Post Office Limited's answers to the specific questions asked in the consultation.

*Question 1:*

*Do you have any views on Ofcom's proposal to review the existing TopNetUK scheme, which could help inform this piece of work?*

As time progresses and technology allows increasing convergence between fixed and mobile services, more end users are substituting mobile for fixed voice services. While it is correct that there is not full substitution yet, particularly on the price aspect of mobile vs. fixed services, the near ubiquitous uptake of mobile voice services in the UK should in the Post Office Limited's opinion require that any reporting of Quality of Service apply equally to all suppliers of telecommunication services, whether they are supplied over fixed or mobile network infrastructure.

*Question 2:*

*To what extent would it be useful for consumers to have access to comparative performance information on broadband speed and broadband quality of service?*

Post Office Limited is aware that Ofcom are undertaking a survey into actual broadband speeds experienced by End-Users. Post Office Limited suggests that this survey should be concluded prior to any decision on whether or not to include a requirement to publish broadband spend information.

Post Office Limited believes that end-users are entitled to know the theoretical maximum speed available at point of sale, but theoretically this should be reasonably similar no matter who would be providing the service. However, supply of this is covered in the recent voluntary code of practice.

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



In regard to quality of service, as there are a multitude of service bundles available from a myriad of ISPs it would be nigh on impossible to produce truly comparable information. Furthermore, due to the highly competitive nature of broadband service provision, poor service would be answered by end-users switching providers.

*Question 3:*

*Do you agree with Ofcom's proposed timetable for phase one of our review of quality of service information?*

Should Ofcom, after representations received in response to this consultation, decide to consult on withdrawing the current direction either in totality or in favour of a revised scheme, Post Office Limited suggest that Ofcom consider forbearance until such time as either a revised condition is put in place or the condition is revoked in its entirety.

*Question 4:*

*Should Ofcom require industry to publish QoS information?*

Yes.

Post Office Limited fully supports the need to inform consumers about the quality of service provided by their telecommunication services. Such information would help consumers make a fully informed choice into who is best placed to supply the services they require.

It is questionable whether the current scheme does actually provide truly comparable QoS information, or if it simply measures the lowest common denominator available in order to assume comparison. The objectivity of the current scheme is therefore in doubt. Furthermore, it is clear from the "hits" the TopComm website receives on a daily basis that end users do not use the information provided in order to make an informed choice when considering their service provider.

Competition within the voice service market is gradually increasing. In order to win and keep customers, Service Providers must offer high levels of service. As part of a bid to win customers, it is therefore beholden on the Service Provider to point to aspects of the service that they believe are fairer, easier or better than their competitors. To do this they must have a robust reporting mechanism in place to monitor levels of service in order to meet their promises to customers. If service levels fall, customers will switch provider. If enough customers leave then the business ceases to be viable. Therefore, monitoring service levels is

Post Office Ltd. Registered in England and Wales no: 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



necessity for voice Service Providers, and providing information on levels of service is a valuable tool in winning and retaining customers. Consequently, the provision of information should not be onerous for Service Providers

*Question 5:*

*Should Ofcom encourage the development of more or more detailed consumer surveys focusing on customer service?*

In much the same way that Ofcom has accredited the price comparison schemes, Post Office Limited believes an accreditation of independent customer service focused comparison schemes using consumer surveys should be investigated.

*Question 6:*

*If we considered it was appropriate to continue requiring industry to collect and publish QoS information, is there any need to amend the existing QoS Direction?*

Yes.

Post Office Limited believes that if the requirement were to continue it should apply equally across all telecommunication services. The scope of the requirement requires amending, the auditing requirements require re-evaluating, and consumer awareness needs to be made paramount if the Direction is to have any real value.

*Question 7:*

*If we considered it was appropriate to continue requiring providers to publish QoS information - and that the existing QoS Direction should be amended - how should the information be made available?*

Post Office Limited believes that Ofcom should investigate accrediting independent customer service focused comparison schemes to publish the information. In addition, the information should be available through the Ofcom website and each Service Provider's own information made available on their own websites, and this information should be able to be used in marketing literature in order to maximise promulgation.

*Question 8:*

*Would third parties - such as price comparison sites - be interested in collating QoS information?*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



Clearly Post Office Limited is not able to answer this question from the perspective of a comparison site provider. However, we see no reason why such third party providers would not be interested in collating and publishing QoS information should there be sufficient consumer demand for it.

*Question 9:*

*If we considered it was appropriate to continue requiring providers to publish QoS information - and that the existing QoS Direction should be amended - what services should be covered?*

Post Office Limited suggests that all telecommunications services, no matter how they are technically delivered, are covered by the Direction.

*Question 10:*

*If we considered it was appropriate to continue requiring providers to publish QoS information - and that the existing QoS Direction should be amended - what type of revenues should the threshold for participation be based on?*

Post Office Limited considers £250k per quarter net revenue of service covered by the scheme to be a more appropriate threshold to apply. By lowering the threshold to report QoS information, new entrants would have the means available to deliver high levels of service at the outset, thus ensuring confidence in the industry as a whole.

*Question 11:*

*If we considered it was appropriate to continue requiring providers to publish QoS information - and that the existing QoS Direction should be amended - should we exempt providers with less than a certain number of subscribers from the requirements?*

If it is assumed that the average revenue per residential user is £200 per year, to include both calls and line rental, then it would be fair to exempt providers with less than 5000 subscribers if the relevant turnover were to be lowered to £1million.

*Question 12:*

*How easily could providers assess whether they hit a subscriber threshold?*

It is beholden on a Service Provider to keep accurate records of subscriber numbers in order to be able to properly manage the business. It therefore seems sensible to suggest that it

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



would be relatively straightforward for a Service Provider to identify if they were to hit a subscriber threshold.

*Question 13:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – what should the relevant turnover threshold be?*

Post Office Limited suggests that £1million per year would be a suitable threshold. However, Ofcom needs to further clarify what is meant by net revenue and relevant turnover as it is not entirely clear what the difference is between the two.

*Question 14:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – how could the information requirements be defined and measured?*

Post Office Limited believes that if the requirement were to continue it would only be effective if the information requirements were simplified, the definitions made clearer and the measures simpler and more concise, creating less opportunity for differing interpretations.

The idea of Stakeholder involvement in the drafting of parameters is, in theory at least, a good idea. However, in practice it results in drafting by committee of conflicting political agendas. This creates frustration and takes a great deal of time for very little output.

Both of the options outlined by Ofcom in the consultation would maintain this inefficient method of defining parameters and is just one of the many reasons why Post Office Limited believes that the continuation of the scheme is untenable.

*Question 15:*

*Should Ofcom remove, keep or replace the existing parameter on service provision?*

This measure should be straightforward and unambiguous, it therefore requires replacing.

Post Office Limited understands customers' desire to know how long it will take to deliver a service, but the parameter as it is currently does not effectively compare like with like, as different Service Providers can set different lead times on the committed date. The longer the lead time of the committed date, the more chance the Service Provider would have to hit

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.





or better that time. However, if Ofcom were to stipulate a set lead time against which to measure service delivery then they would artificially inhibit competition and Service Providers' rights to choose target markets for their service. For example, a Service Provider may decide to target the new line provision market, which would have a longer lead time to supply than a line take over proposition.

*Question 16:*

*How much would it cost to introduce and maintain a new parameter on service provision?*

Unfortunately, Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 17: As a provider, is data on service provision something you already collect?*

Yes.

*Question 18:*

*Do you agree with this definition of 'complaint'?*

In the view of Post Office Limited, the fact that this parameter is dealt with in other Ofcom initiatives - namely the Review of Alternative Dispute Resolution and Complaints Handling Procedures - would render the continuance of gathering information overly burdensome to Service Providers. As Ofcom are proposing record keeping in regard to complaints, this definition runs the risk that the two initiatives will create conflicting requirements, with escalating costs to providers to comply with both.

The standardisation of the definition of complaint across the two initiatives is welcomed. However, as such disconnect has already occurred it only highlights the potential for double jeopardy between the two schemes.

Post Office suggests the following definition:

*"Complaint means an expression of dissatisfaction made to a Communications Provider related to its non-technical delivery of products or services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected."*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



Post Office Limited further suggests that for the avoidance of doubt, the following are listed as NOT being classified as a complaint:

- Nuisance calls
- Called in error problems
- Fault reports
- Request for information
- Placing of orders

*Question 19:*

*Should Ofcom remove, keep or replace the existing parameter on complaints?*

Ofcom should remove the existing parameter on complaints; for the reason explained above - that the handling of complaints is governed by the requirement under GC 14 to have a Code of Practice and alternative Dispute Resolution mechanism in place. This is currently being reviewed by Ofcom and therefore should be dealt with there.

*Question 20:*

*How much would it cost to introduce and maintain a new parameter on resolution of complaints (option 3a)?*

Unfortunately Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 21:*

*How much would it cost to introduce and maintain a new parameter on total number of complaints (option 3b)?*

Unfortunately Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 22:*

Post Office Ltd. Registered in England and Wales no: 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.





*If a new parameters on total complaints per thousand customers was introduced (option 3b), should customers taking multiple services count as multiple customers?*

No: counting customers' services as if they were multiple customers would create the environment for customer services to be offered in silos rather than as a complete customer experience. It should not matter how many services a customer takes from a Service Provider, they should be able to expect a holistic and consistently high level of service from the company.

*Question 23:*

*If new parameters were introduced, is there a case for requiring complaints data to be published separately for fixed voice, mobile and broadband services?*

It needs to be clear what the customer is complaining about, and Post Office Limited therefore suggests further investigation on whether to require separate publication of complaints information for different products.

*Question 24:*

*As a provider, is data on complaints something you already collect?*

Yes.

*Question 25:*

*How could we ensure complaints were being recorded in an accurate and comparable way, and how could we avoid the potential for gaming by providers?*

This is currently under review in the Ofcom consultation dealing with the Review of Alternative Dispute resolution and Complaints handling Procedures.

*Question 26:*

*Should Ofcom remove or replace the existing parameter on complaints about faults?*

Currently there is no specific parameter for complaints about faults. However, as different Providers offer different fault resolution times, any parameter would not be truly comparable. Furthermore, if Ofcom were to create a parameter with a measure of service repair time based in hours to fix they would distort competition by forcing Providers to change how they utilise and market fault fix packages.



*Question 27:*

*If we introduced a new parameter, should it be limited to broadband providers?*

No.

Any new parameter should apply equally across all Telecommunications services as complaints have the same detrimental effect on consumer experience no matter what they are about.

*Question 28:*

*How much would it cost to introduce and maintain a new parameter on complaints about faults?*

Unfortunately, Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 29:*

*As a provider, is data on complaints about faults something you already collect?*

Post Office Limited collects information on faults and on complaints but not specifically complaints about faults.

*Question 30:*

*Should Ofcom remove or replace the existing parameter on how long it takes to repair a fault?*

Post Office Limited believes that this parameter needs to be straightforward and unambiguous. However, different types of fault take different amounts of time to rectify and different service levels would bring about different perceptions of what a fault is. Post Office Limited offers a simple pricing structure offering the same level of service across all packages. This does not automatically apply to all Service Providers. Where a Service Provider may choose to offer a differentiated service package offering different levels of service for different prices, customers would expect reported faults to take different times to repair, having agreed up front to a specific fault fix times when subscribing to a particular product. Any parameter therefore needs to take into consideration the service delivery packages available when defining the parameter.

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



*Question 31:*

*How much would it cost to introduce and maintain a new parameter on how long it takes to repair a fault?*

Unfortunately Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 32:*

*As a provider, is data on how long it takes to repair a fault something you already collect?*

Yes.

*Question 33:*

*Should Ofcom remove or keep the existing parameter on billing accuracy complaints?*

Ofcom should remove the existing parameter; since billing accuracy is covered by the TMBS requirement and does not therefore require reporting, as the TMBS is required to be audited separately.

*Question 34:*

*How much would it cost to providers not currently part of the TopComm Forum to introduce and maintain the existing parameter on billing accuracy complaints?*

This is not a question Post Office Limited is able to answer, as the response is dependant on many different factors, such as the scale of business, type of operation, etc.

*Question 35:*

*As a provider, is data on billing accuracy complaints something you already collect?*

Yes.

*Question 36:*

*Should Ofcom introduce a new parameter on the time it takes to answer a consumer's call?*

There has been much media publicity recently surrounding the answering of customer service calls. This has led to great improvements in the industry to call answering times. This demonstrates that it is not necessary to have regulatory

Post Office Ltd. Registered in England and Wales no: 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



measures in place in order to increase efficiency in the industry.

Furthermore, it is already part of the Phone Pay Plus Code of Practice that call centres accessed by premium rate numbers must answer calls within a certain time. Perhaps Ofcom should investigate the possibility of having a similar requirement

*Question 37:*

*How much would it cost to introduce and maintain a new parameter on the time it takes to answer a consumer's call?*

Unfortunately, Post Office Limited is unable to answer this question as we sell a fully managed service delivered by a third party. However, the introduction of any new parameters would require extensive negotiations with our supplier that would take some considerable time to conclude and therefore incur significant costs to the business.

*Question 38:*

*As a provider, do you already have in place systems that capture the time it takes for your customer service agents to answer a customer's call?*

Yes.

*Question 39:*

*If we considered it was appropriate to continue requiring providers to publish QoS Information - and that the existing QoS Direction should be amended - should providers be required to publish QoS information on bundles?*

This question only goes to highlight the difficulty of requiring comparable information regarding quality of service. Bundles of services are essentially multiple services packaged as to be attractive to consumers. Different bundles will have different service levels attached to them. As Ofcom has highlighted within the consultation document, the most important factor that consumer's look at when choosing communications services is price. Service Providers are generally able to offer a reduction in price if multiple products are taken since service provision is more efficient, as many products utilise the same back office systems and processes. However, a fault on an end-users narrowband line may also cause a fault on the broadband. In that circumstance, under what category should the fault be reported? Or should the same fault be reported twice? If twice, this acts as a disincentive on Providers offering bundled products and therefore a negative impact on

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



competitive communications services. If faults affecting two different services are only reported once then again this has a negative impact on competition, as an end-user who may take narrowband from one provider and broadband from another as the fault would be reported against both providers, thus duplicating the fault where only one fault actually exists. Moreover, it would be unfair on single product service providers if bundles were excluded from reporting altogether.

*Question 40:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – who should QoS information be provided for? Should this include large business consumers?*

Post Office Limited's Communication products are currently aimed at residential consumers only. While we agree that all consumers should be in a position to make a fully informed choice as to where to purchase their communications services, it is clear from the usage statistics of the TopComm website that the information provided by Service Providers is rarely used to help inform consumer's choice. This could be for a variety of reasons – perhaps that the TopComm website is not widely known about, or perhaps that QoS information does not figure highly on consumers list of things to find out about prior to making a decision, as opposed to price.

*Question 41:*

*What evidence do you have that small and large businesses would / would not benefit from QoS information?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer any evidence.

*Question 42:*

*Would information on one or more particular services be more or less valuable for different sizes of businesses?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 43:*

*Could reporting information for small and large businesses together be misleading?*



Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 44:*

*How could Ofcom distinguish between small and large businesses?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 45:*

*How easy would a threshold based on the Communications Act definition be to implement and how much would it cost?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 46:*

*How easy would a threshold based on a business customer's annual communications spend be to implement and how much would it cost?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 47:*

*How easy would a threshold based on whether a business had a bespoke service level agreement in place with its provider be to implement and how much would it cost?*

Post Office Limited currently only provides service to residential consumers and are therefore not in a position to offer an opinion on this issue.

*Question 48:*

*As a provider, do you internally audit information on quality of service? What data do you audit and how much does this cost?*

As Post Office Limited sells a fully managed service delivered by a third party, they undertake the internal audits. Post Office Limited monitors this closely to ensure that our high standards are met. All information required by the current scheme is measured. We are unable to supply costs into this

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.





activity as the costs are not separately identified within the pricing structure of the fully managed service.

*Question 49:*

*If a member of the TopComm scheme, did you internally audit information on quality of service prior to the imposition of the scheme and what, if any, additional auditing costs did you incur as a result of the scheme?*

No, as Post Office Limited is a relatively new entrant into the telecommunications service market. From the launch of the service we quickly reached the threshold at which the scheme became mandatory and therefore ensured we were able to comply as soon was practicable.

*Question 50:*

*If we considered it was appropriate to continue requiring providers to publish QoS information - and that the existing QoS Direction should be amended - should Ofcom determine the verification process or leave it to providers?*

Ofcom mention that the current comparability auditor suggests that up to 20% of providers do not interpret the scheme's definitions correctly; Post Office Limited suggests that this is due to the definitions themselves being open to interpretation rather than any systemic abuse by providers. This misinterpretation demonstrates the flawed nature of the current scheme and strengthens the argument against continuing the scheme as it currently stands. Should Ofcom conclude that providers should continue to publish QoS information then the most cost effective way of auditing the information would be for providers to undertake an internal audit with clear, concise definitions.

*Question 51:*

*Should any verification process include either an internal or independent audit, or both?*

The duplication of effort that engaging an external auditor creates makes the costs of such a process prohibitive. Furthermore, an independent auditor would not be familiar with the internal workings and nuances particular to providers, and would therefore require a great deal of time in order to familiarise themselves and understand particular providers' systems and processes. Therefore, should Ofcom consider it necessary to continue with the requirement Post Office Limited strongly urges the requirement for an internal audit or an audit process similar to that used in the TMBS.

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



*Question 52:*

*If we considered it was appropriate for data to be audited internally, should internal auditors be required to possess a recognised qualification?*

Post Office Limited employs a large number of internal auditors to audit a wide range of services offered by Post Office Limited. The majority of our internal auditors have over 15 years experience, but not necessarily a formal qualification. Post Office Limited clients such as the DVLA are perfectly happy with this arrangement. We therefore see it as unnecessary for internal auditors to have a formal qualification.

*Question 53:*

*What would be an appropriate qualification for internal auditors?*

Post Office Limited suggests that Ofcom create an accreditation scheme.

*Question 54:*

*Should internal auditors have to pass a test on the regime and, if so, who should administer it?*

Post Office Limited asserts that Ofcom would be the most appropriate administrators of such a test.

*Question 55:*

*If we considered it was appropriate for data to be audited internally, how often should internal audits take place?*

Post Office Limited suggests that data should be audited internally every 6 months.

*Question 56:*

*If we considered it was appropriate for data to be audited independently, how often should independent audits take place?*

Post Office Limited asserts that if appropriate, data should be audited externally every 12 months.

*Question 57:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – how frequently should data be submitted for publication?*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



Post Office Limited believes that data should be published every 6 months to align with our proposal of 6 monthly internal audits.

*Question 58:*

*How long a period would be required between the end of the data collection period and the publication of information?*

Post Office Limited suggests that a period of one month would be appropriate.

*Question 59:*

*What would be an appropriate sample size in order to ensure that information is robust?*

A sample size of 5% would provide an acceptable level for statistical hypothesis testing.

*Question 60:*

*As a provider please could you provide information on;  
the number of stages involved in each QoS event set out in section 5;  
the number of sites (locations) associated with each QoS event;  
the percentage of QoS events located at each site; and  
the number/percentage of sites based overseas*

For provisioning - 5 stages, 2 sites 50% at each site  
For faults/restoration - 9 stages, 2 sites, 80% at one site 20% at the other.  
For Complaints - 8 stages, 4 sites, 70% at one site, 20% at another and 5% at each of the other 2 sites.  
For Billing Complaints - 8 stages, 4 sites, 70% at one site, 20% at another and 5% at each of the other 2 sites.  
For Answering Calls - 4 stages, 4 sites, 40% at one site and 20% at each of the other sites.

We have three sites in the UK and one in the Republic of Ireland.

*Question 61:*

*How many site visits do you consider appropriate and why?*

The appropriate number of site visits can vary, depending on how many visits are required to gather all the relevant information.

*Question 62:*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



*If we considered it was appropriate to audit the data internally what measures should an internal auditor take to verify the QoS information?*

Post Office Limited's experience with internal audits has identified the following key points:

- The internal auditor must be free to report findings regardless of whether this is critical of the business for which they work ie. they must not be influenced on how to report if the findings that show the provider in a bad light
- Ensure that they are conversant with QoS measures and the associated definitions and processes (including any exclusions)
- Identify all sites connected with the QoS events, QoS data or processes
- Identify key personnel and key systems/processes
- Visit all sites involved with the generation of QoS data or the processes involved in the production of the data
- Audit of processes, systems and a cross section of personnel at the various sites, to confirm they are sufficient and competent for the accurate capture and reporting of the QoS data for each parameter through observation, discussion, interview, examination of records and scenario based questioning
- Sampling and analysis of data to verify the findings of the process/system/people audit. ie. if the process audit reveals no weakness then the sampling should support this.
- Extended sampling and analysis if necessary
- Reporting of audit findings and any weaknesses / failings
- Follow up audit activity if necessary to verify actions taken by the provider to rectify any weaknesses/failings previously identified
- Communication of decision on each of the QoS measures – pass or fail the audit and the result if the provider passes the audit based on the pre-determined calculations or output of the definition ie. Average time in working days to resolve a complaint
- Reporting of results for independent audit/comparability if required

*Question 63:*

*If we considered it was appropriate to audit the data independently, what measures should an independent auditor take to verify QoS information?*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



Post Office Limited suggests that appropriate measures for independent audits should be the same as for the internal audits but with the exclusion of the first and last two points.

*Question 64:*

*To what extent should Ofcom specify how audits should be carried out?*

If the scheme is to be mandated by Ofcom, Post Office Limited suggests that Ofcom fully specify how the audits should be carried out.

*Question 65:*

*If we considered it was appropriate to audit the data internally and independently, should we amend the existing Direction to make the verification process more robust?*

Yes; any verification process should be clear, concise and unambiguous.

*Question 66:*

*Would there be scope to reduce the cost of site visits if providers used the same independent auditor?*

Post Office Limited asserts that at this stage it is impossible to answer this question.

*Question 67:*

*What would be the cost of an internal auditor visiting all sites over a period of a year?*

Post Office Limited is unable to supply information on costs for this activity, as such costs are not separately identified within the pricing structure of the fully managed service.

*Question 68:*

*If we considered it was appropriate to audit the data independently, how should any independent auditor(s) be appointed?*

Post office Limited suggests that any independent auditor should be appointed by Ofcom in an open tender process.

*Question 69:*

*If we considered it was appropriate to audit the data independently, should providers all appoint the same independent auditor?*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.



If the auditor was appointed by Ofcom then it would be sensible for all providers to use the same audit function.

*Question 70:*

*If they published QoS information, should providers publish trend data?*

Post Office Limited believes that it would be desirable for providers to publish trend data, but that this should not be mandated. It would be helpful if Ofcom could publish guidelines on how to produce such information in a fair and non-discriminatory way.

*Question 71:*

*How could the information be made accessible to all consumers, in particular disabled consumers and consumers without Internet access?*

Post Office Limited suggests that Ofcom ensure that all information that is mandated to be published should be made equally accessible to all consumers by promulgating it themselves.

*Question 72:*

*Should providers be required to provide a link to the specified website on their websites? Where should the link appear and what should it say?*

No. Providers should be able to choose to link to all the published information, but publish their own data on an appropriate page.

*Question 73:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – what should be done to promote awareness of the scheme and improve usage of the information?*

Individual providers should be able to promote instances of high achievement as long as it is coupled with equally stated information informing consumers how to access the full results. However, Post Office Limited suggests that Ofcom should be the main promoter of this information.

*Question 74:*

*If we considered it was appropriate to continue requiring providers to publish QoS information – and that the existing QoS Direction should be amended – is 'TopComm' the right name*

Post Office Ltd. Registered in England and Wales no. 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.





*under which to publish the information or should alternatives be considered?*

Post Office Limited believes that the "TopComm" name is part of the reason end-consumers are not aware of the existence of the publication of quality of service information. TopComm as a name does not portray the essence of what the requirement was meant to provide - i.e. publication of quality of service data by telecommunication service providers. Therefore, as it is clear that TopComm is not a name associated with the publication of quality of service data, the data should be published under an alternative name that actually describes what it is, rather than a generic brand name.

Should you have any questions relating to any part of this response, please don't hesitate to get in touch.

Yours Sincerely,

Nancy Saunders  
Head of Telecoms Regulation  
Post Office Limited

Post Office Ltd. Registered in England and Wales no: 2154540. Registered office: 80 - 86 Old Street, London, EC1V 9NN.  
Post Office and the Post Office symbol are registered trade marks of Post Office Ltd.

Post Office Ltd is an appointed representative of The Governor and Company of the Bank of Ireland, which is authorised by the Irish Financial Regulator and the Financial Services Authority; regulated by the Financial Services Authority for the conduct of UK business. Bank of Ireland, incorporated in the Republic of Ireland with limited liability. Registered in England and Wales with branch number BR000459.

Card Account offered by J.P. Morgan Europe Ltd through Post Office Ltd. J.P. Morgan Europe Ltd is authorised and regulated by the Financial Services Authority. Registered in England & Wales No. 938937. Registered Office: 125 London Wall, London EC2Y 5AJ.