

The TopComm Forum is unable to produce a response adhering to the structured questions within the consultation.

The following points represent the view of the TopComm group as a whole. Individual members of TopComm will submit their own responses separately.

1. The scheme in its current form does not provide value to consumers.
2. The current scheme is costly and ineffective.
3. The scheme does not address the intrinsic differences between different types of customer.
4. The proposed new measures exhibit the same problems.
5. Expansion to other services will further add to all the current issues within the group.
6. Other directions, definitions and schemes (e.g. TMBS, complaints, Phonepayplus) have crossover with and in some cases contradict the current and proposed TopComm measures.
7. The requirement for any scheme must be evidence based.
8. There should be proof from Ofcom that a scheme is required.
9. Ofcom should meet statutory obligations for any scheme to be justifiable and proportionate.
10. Any information of this type will have fundamental comparability issues due to the differences between the ways in which companies operate and the products they sell.
11. These comparability issues will not be resolved solely by independent audit.
12. It is not currently taken into account that all operating costs, including the cost of the scheme, are passed on to the customer – e.g. would Ofcom consider asking the customer “would you like to pay for this information?”
13. No TopComm member would actively promote this type of information or incur cost to do so.

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