

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?:

Needs to be done on a like for like basis with regards to the business model and size of organisation.

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?:

The key element consumers are interested in is price.

Question 3: Do you agree with Ofcom's proposed timetable for phase one of our review of quality of service information?:

Yes

Question 4: Should Ofcom require industry to publish QoS information?:

Yes

Question 5: Should Ofcom encourage the development of more or more detailed consumer surveys focusing on customer service?:

No. That is a personal issue. Everyone thinks their customer service is excellent, personalities within the company and from customers is the real determining factor.

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. Has to be done on a like for like basis. Service by service and according to the SP's size.

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?:

As it is currently, but with greater advertising.

Question 8: Would third parties ? such as price comparison sites ? be interested in collating QoS information?:

Probably not. They are there to show price comparison. Whilst many look for the cheapest, there are some who will feel that you get what you pay for.

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?:

All Services, but on a like for like basis.

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?:

All levels, there should be no escaping this, however the participants should be banded and compared against those in their own band.

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?:

No, with SP's banded by size and service size, it would ensure a fair like for like comparison.

Question 12: How easily could providers assess whether they hit a subscriber threshold?:

By the monthly billing figures by service.

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?:

There shouldn't be a threshold. If an SP wants to provide a service he should report on it.

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?:

Grouped by size of SP and volume of service provided.

Question 15: Should Ofcom remove, keep or replace the existing parameter on service provision?:

Replace it with a more accurate divide of services.

Question 16: How much would it cost to introduce and maintain a new parameter on service provision?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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??:

Yes

Question 19: Should Ofcom remove, keep or replace the existing parameter on complaints?:

Remove. Often a complaint can be a personal issue that is recorded as it falls within the parameters but in reality is nothing more than a customer with little or no understanding in the processes and procedures.

Question 20: How much would it cost to introduce and maintain a new parameter on resolution of complaints (option 3a)?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

Question 21: How much would it cost to introduce and maintain a new parameter on total number of complaints (option 3b)?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

Question 22: If a new parameters on total complaints per thousand customers was introduced (option 3b), should customers taking multiple services count as multiple customers?:

Yes

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?:

Yes

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?:

Extremely difficult and almost impossible.

Question 26: Should Ofcom remove or replace the existing parameter on complaints about faults?:

Remove

Question 27: If we introduced a new parameter, should it be limited to broadband providers?:

No

Question 28: How much would it cost to introduce and maintain a new parameter on complaints about faults?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

Question 29: As a provider, is data on complaints about faults something you already collect?:

Yes

Question 30: Should Ofcom remove or replace the existing parameter on how long it takes to repair a fault?:

No

Question 31: How much would it cost to introduce and maintain a new parameter on how long it takes to repair a fault?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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?:

Keep

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?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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?:

Yes

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?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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?:

No, bundled solutions are individually tailored by an SP, however the underlying Terms and Conditions should be standardised so they are not misleading for customers.

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?:

Yes

Question 41: What evidence do you have that small and large businesses would / would not benefit from QoS information?:

They should also be included.

Question 42: Would information on one or more particular services be more or less valuable for different sizes of businesses?:

Yes

Question 43: Could reporting information for small and large businesses together be misleading?:

Yes, extremely.

Question 44: How could Ofcom distinguish between small and large businesses?:

Billing thresholds and number of minutes.

Question 45: How easy would a threshold based on the Communications Act definition be to implement and how much would it cost?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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?:

Don't know.

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?:

Due to the way our organisation captures this information the costs would be minimal. For others it could be extremely costly.

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?:

Yes, all current required measurements.

Due to the way our organisation captures this information the costs are minimal.

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. Development costs of existing system and the use of an external consultant to assist in the setting up of our QOS measuring.

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?:

It should not be left open for interpretation, but dictated by OfCom.

Question 51: Should any verification process include either an internal or independent audit, or both?:

Both

Question 52: If we considered it was appropriate for data to be audited internally, should internal auditors be required to possess a recognised qualification?:

Yes

Question 53: What would be an appropriate qualification for internal auditors?:

Not Sure.

Question 54: Should internal auditors have to pass a test on the regime and, if so, who should administer it?:

OfCom

Question 55: If we considered it was appropriate for data to be audited internally, how often should internal audits take place?:

Monthly

Question 56: If we considered it was appropriate for data to be audited independently, how often should independent audits take place?:

Quarterly

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?:

Quarterly

Question 58: How long a period would be required between the end of the data collection period and the publication of information?:

1 month

Question 59: What would be an appropriate sample size in order to ensure that information is robust?:

25%

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:

Question 61: How many site visits do you consider appropriate and why?:

Question 62: If we considered it was appropriate to audit the data internally what measures should an internal auditor take to verify the QoS information?:

Sampling

Question 63: If we considered it was appropriate to audit the data independently, what measures should an independent auditor take to verify QoS information?:

Sampling

Question 64: To what extent should Ofcom specify how audits should be carried out?:

Guidelines

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

Question 66: Would there be scope to reduce the cost of site visits if providers used the same independent auditor?:

Yes

Question 67: What would be the cost of an internal auditor visiting all sites over a period of a year?:

Unsure

Question 68: If we considered it was appropriate to audit the data independently, how should any independent auditor(s) be appointed?:

By OfCom

Question 69: If we considered it was appropriate to audit the data independently, should providers all appoint the same independent auditor?:

Yes

Question 70: If they published QoS information, should providers publish trend data?:

No

Question 71: How could the information be made accessible to all consumers, in particular disabled consumers and consumers without Internet access?:

Library publications

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?:

Yes

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?:

Better advertising of it in the public domain.

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

No. It should come under OfCom.

Additional comments:

Our biggest issue with the reporting was that we were never on an even playing field, reporting like for like with other SP's.

As our core business is lines and calls with very little NGN's our figures never looked good compared to other SP's who had a larger volume of NGN's which don't really have faults or issues with provisioning. We know we are achieving a high level of QOS and that our data capture is one of the best and most accurate in the industry, but in comparison with other SP's we looked poor.

This has been borne out when we have had our service reviews with BT and they are telling us we are above average compared to industry standards on some measurements but the OfCom measurements show us to be below average.

Should OFCOM want to lower the threshold and force smaller SP's to report, then they need to establish separate bands depending on the SP's size and type of business so that comparisons can be drawn up on a like for like basis.