

**Title:**

Mr

**Forename:**

Charles

**Surname:**

Adams

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep nothing 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

**Question 1: Do you agree that it is helpful and appropriate for Ofcom to issue guidance on the application of the Regulations to consumer contracts for communications services?:**

Yes

**Question 2: Do you agree with Ofcom's proposed guidance regarding core terms and transparency?:**

Ancillary charges which do not relate directly to Telecommunications and account for no more than 15% of the total charge should not be included as Core Terms as they do not fit the following definition.

In so far as it is in plain intelligible language, the assessment of fairness of a term shall not relate-

(a) to the definition of the main subject matter of the contract,

or

(b) to the adequacy of the price or remuneration, as against the goods or services supplied in exchange

**Question 3: Do you agree with Ofcom's proposed guidance (including any administrative thresholds we have set) on non-core terms to which we apply the test of fairness?:**

Yes in broad terms

**Question 4: Are there any other issues that are covered by the Regulations which Ofcom should give guidance on?:**

1 Any charge for non direct debit is unfair if the supplier does not meet minimum requirements for billing accuracy and resolving customer complaints.

2 Terms should include compensation for costs incurred due excess charges from a DD due to erroneous billing.

3 Terms should state clearly the process for raising a query and ?bouncilg ? a direct debit.

4 Customers should not suffer any advserse consequences for ?bouncing? a direct debit, such as disconnection, re-connection charges & penalty charges.

**Additional comments:**

Ofcom should publish bi-annually the expected direct costs of processsing payments differentiating between cheques and electronic payments for cusomers to use as a guide to whether charges are fair