

**Title:**

Mr

**Forename:**

John

**Surname:**

Loader

**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:**

Yes

**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?:**

No - it keeps talking about competition but for many consumers exchange lines can only be provided by one supplier BT - we cannot choose another if we feel BT is overcharging as there is no LLU in many country exchanges.

**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?:**

No - seems like the telecomms companies have only to use their own figures that claim costs and publish whatever the charge is and the consumer has to pay

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

Electronic payments - these should within the normal Direct Debit 10 day period be exempt from charges. They cost the provider nothing - indeed they may gain through early payment and have no administration costs in setting and maintaining the Direct Debit. Charging £4.50 when the cost is zero seems an odd thing for Ofcom to allow

**Additional comments:**

1. The market is only competitive where alternatives to the main incumbent BT exist (excluding satellite and mobile). Any reference to competitive charges in your document only refer to those places where such competition exists - the towns and cities and not the country areas and probably never will. Also in some exchanges BT has run out of jumper space to allow a competitor to sell unbundled lines (Poplar)
2. Whilst cash handling and cheque management incur obvious costs electronic payment methods do not and should not be charged for