

**Title:**

Mr

**Forename:**

Michael

**Surname:**

Lowe

**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 it would certainly be helpful. However, I think that they should be much tougher than is being proposed.

I think some of these additional charges are illegal under the Unfair contract terms Act 1999.

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

Transparency is always to be welcomed, but this misses the heart of the problem.

All adverts should first specify the highest price paying by the highest cost payment method, in numbers ten times larger than any other. This would encourage serious competition on all charges.

**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?:**

Far too weak.

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

Ofcom appear to have obtained no information on the true costs of different payment methods. The cost of collecting money is inherent to all businesses and ideally should be included in there charges.

I believe these additional charges are not true reflections of cost, but force customers into paying by direct debit. Companies want this because those paying by direct debit are less likely to leave. Why should customers be forced into paying by direct debit, giving incompetent companies with appalling customer service full access to their bank accounts.

**Additional comments:**

Companies seem very keen on applying late payment charges. However, I have received a Bill from BT on the day it was due to be paid - they appear to shortening payment periods to increase revenue from these charges.

When they owe money to customers they often take months to make the payment - no late payment charges or interest. Why aren't customers compensated?