

Title:

Forename:

Surname:

Representing:

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name 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 - very helpful and appropriate

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

Transparency recommendations are fine. There is one key area that is not covered adequately in my opinion - the charges to re-connect the service.

Currently, I am trying to get a phone line connected in order to be able to get broadband. The previous tenant of the property had a phone line connected. BT will not connect me without charging me £124.99 one off. This charge seems unreasonable as the line has been connected before and it requires a simply electronic switch to re-connect. I also get different stories from the call centre - some say it

requires an engineer as my cables were physically disconnected at the local exchange when the previous tenant moved out (seems unlikely and unnecessary when a simple software switch can turn off a service) while other staff tell me that the previous tenant must have switched to another landline provider and so will charge £125 to bring me back. Calling other landline providers like talk talk, they tell me that I have to sign up to a BT before I can switch to them. Essentially, moving home requires a one off fee of £125 to BT.

The second issue is - I don't want a phone line. I just want broadband. I don't see why I have to pay BT or another landline service for free evening and weekend calls, a phone number, voicemail and many other services that I don't want and will not use. While broadband ADSL uses the copper wires to transmit the information I am paying for that service with my monthly broadband fee. Why do I have to rent the line from BT for £11.75 per month on top of this. There are minimal costs to BT in keeping me connected to the copper cables and I feel I am forced into buying services I don't need so that BT can put the charge up to £11.75 per month.

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?:

As above - re-connection charges and forced charges for services we don't need are not covered in great enough detail. I think they should be addressed more specifically.

The test of fairness seems to go a little too easy on the service providers - particularly with respect to costs. You seem to investigate the costs of services to the operator and if the charges are roughly in line with costs then that makes them fair. This rationale provides an incentive for a publicly listed company to ensure that costs do not drop as this would feed through to a drop in reported revenues. E.g. why should it cost the operator anything to have a phone service that has been moved to incoming calls only switched back to full service once you have paid. This can be done automatically at zero cost to the operator (and therefore the consumer).

You should be much more aggressive in investigating if the costs are over-inflated like you do with Direct Debit.

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

Yes - why we have to pay for services we don't use in order to have access to other services e.g. phone line, phone number, discounted calls, voicemail, CS, billing, account management etc. when all I want is access to broadband.

A classic example of trying to raise prices and get higher margins out of commodity services.

Additional comments:

Generally this report seems pretty balanced. Some of the charges you state are reasonable (e.g. extra costs for itemisation because of excess paper and postage costs to the operator) I would disagree with. The marginal costs must be in the individual pence per month so it is stretching credibility to say that charging £1 or more per month for itemised bills is reasonable. Other than a few instances, the tone seems about right