

Title:

Dr

Forename:

Peter

Surname:

Barth

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?:

No.

Non-direct debit charges should not be lumped together: processing charges vary a lot between payment by cash at a counter, a posted cheque or by direct transfer (BACS) from an internet bank. The latter costs no more than DD, companies should not be allowed to make extra charges for customer-initiated BACS payments.

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.

I doubt that competition alone will make BACS free of extra charges. Companies misuse the power that DD gives them. I have seen many examples where utility companies over-charge and then wait for the customer to reclaim the excess taken. At any time they must hold millions of pounds that they have over-charged. I prefer to be the initiator of BACS payments and find it unfair to be charged for this.

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

Additional comments:

One of the great benefits of internet banking is the ability to pay bills instantly without the costs and inconvenience of cheques and postage. I find it profoundly unfair and unjustified for companies to charge extra for a BACS payment. I hope Ofcom will provide guidance to this effect.