

**Title:**

Mr

**Forename:**

Paul

**Surname:**

Robb

**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?:**

Not entirely I think the issue of transparency needs to be considered more widely, my particular issue is with BT who sent out a document that was intended to justify the price differential for those who continued to pay their bill in the 'traditional' way and the direct debit. The arguments used did not make sense. For me transparency should also be about the rationale and justification when differential pricing for the same service or product is used. Had there been an across the board increase then I may not like it but accept it or move supplier. When a differential system is introduced then in my view it is not an unrealistic expectation to have a proper justification for any 'tariff' added to the bill, particularly as the main arguments used were late payment and added processing costs.

**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?:**

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

**Additional comments:**

When BT arbitrarily imposed the additional payment for paying on a standard quarterly bill they stated that this was to cover additional processing costs of dealing with paper bills, delay in payment etc. I asked (and never received a reply) how there was an additional cost in my case as I pay immediately upon receipt of the bill by internet banking which in effect mirrors the electronic transfer that a direct debit would do. Furthermore as the quarterly bill contains two components a 'forward' payment for line rental as well as an historical payment for call charges this must be of financial benefit to BT which does not appear to have been taken into account at all. Lastly the levy is a monthly charge of £1.50 for a quarterly bill! how can that be reconciled with the explanation and justification given? Is the individual transaction cost £4.50 per bill paid through this means? There must also be a difference between people like myself who pay via internet banking and those who use traditional 'paper' methods yet this treats all payment methods the same unless we are prepared to pay by direct debit which gives a significant financial benefit to the supplier. OfCom does not appear to have addressed this unfair practice in its document.