



Direction under General Condition 21.1 on Quality of Service

Proposed modification

Consultation

Publication date: 27 January 2006

Closing Date for Responses: 28 February 2006

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Section 1

Summary

- 1.1 The provision of comparable Quality of Service ("QoS") information is beneficial to consumers and Ofcom is committed to ensuring it is supplied. On 27 January 2005, Ofcom published *A Statement on setting quality of service parameters: Notification of Direction*. <http://www.ofcom.org.uk/consult/condocs/qualitystate/statement/#content>
- 1.2 The Direction requires specified Communications Providers¹ providing voice services at a fixed location to publish QoS information covering: supply times, fault rates and fault repair times; billing complaints; and complaint resolution times. The Direction stipulates that data collection should commence within nine months of Ofcom publishing the Direction (28 October 2005), the first publication of that period's data should be six months after that (28 April 2006), followed by regular publication of data in at least six monthly intervals thereafter (28 October 2006 and beyond).
- 1.3 The forum established to implement the Direction, Topcomm, has made good progress and data collection began on 1 October 2005. However the exercise has highlighted some systems and process issues such that Topcomm has requested a short extension to the publication deadline to allow for a pilot phase for testing.
- 1.4 Under Topcomm's proposals, the data collected between October and December 2005 would be used as 'test' data. The formal data collection would be considered to have commenced on 1 January 2006, with the first set of results proposed to cover January to March 2006, published in July 2006.
- 1.5 While Ofcom welcomes the commitment demonstrated by Topcomm to date and the progress made, Ofcom expects publication of the data in the timetable set out in the Direction.
- 1.6 However, Ofcom considers it appropriate to consult on extending the period by which the data needs to be collected – from nine months to a year. The effect being that the publication date is now on or before 28 July 2006, and at least six monthly intervals thereafter.
- 1.7 Our primary concern is to ensure that the quality of service parameters benefit consumers and that the data is objective, reliable, timely and up-to-date. We believe this proposed extension provides an opportunity to resolve comparability issues and test the website for user friendliness and accessibility prior to public launch.
- 1.8 Any change to the timetable set out in the Direction of 27 January 2005, requires a modification to the Direction, on which Ofcom is required to consult.
- 1.9 Therefore, Ofcom proposes to modify the Direction, published on 27 January 2005 as follows:
 - The definition of "Measurement Commencement Date" being modified to mean one year (rather than nine months) from the date the Direction was published, being the date when the Communications Providers begin to

¹ Communications Provider means a person providing Publicly Available Telephone Services by means of a Public Telephone Network at a fixed location which has at least £4 million in net revenues per quarter and 100 million minutes of calls handled to End-Users per quarter.

Direction under General Condition 21.1 on Quality of Service

accumulate the relevant Quality of Service Parameters data in order to comply with the obligations set out in paragraph 1 of the Direction.

- 1.10 Ofcom is consulting on this proposed modification for a period of one month. The closing date for the receipt of representations is **no later than 5.00 pm on Tuesday 28 February 2006.**
- 1.11 Those Communications Providers covered by the existing Direction are obliged to continue with data collection and preparation. Any provider who is unable to demonstrate that its processes and procedures will be able to deliver to the agreed timescale, may be subject to formal investigation by Ofcom.
- 1.12 User testing on the accessibility and user friendliness of the publication will be an integral part of the development of the initiative. In addition, Ofcom will continue to monitor consumer attitudes and behaviour with respect to QoS information. Towards the end of the year we will undertake a review of End-User satisfaction with the QoS published information, including how it is used and valued by residential and business consumers. Ofcom will also monitor how the needs of vulnerable consumers are being met.

Section 2

Background

Introduction

- 2.1 The provision of comparable Quality of Service (“QoS”) information is beneficial to consumers and Ofcom is committed to ensuring it is supplied. Ofcom research has found that service quality is consistently mentioned by consumers as the second most important driver of switching, after price. Evidence from the Ofcom Contact Centre shows that a significant number of consumers complain about the service levels they receive from their suppliers. And we anticipate that quality of service will be a significant issue in the transition to next generation networks. It will therefore be important that this area is carefully monitored.
- 2.2 In line with our regulatory principles, Ofcom has encouraged the market to provide information on QoS indicators through an industry-led approach in which network operators and service providers define and manage the scheme and collectively publish indicators for use by consumers. Our aim is to ensure that information provided for consumers is objective, reliable, timely and up-to-date.

Ofcom’s Duties and Functions

- 2.3 Ofcom, in reaching its decision on the provision of QoS information to End-Users in January 2005, considered its principal duty set out in Section 3 (1) of the Communications Act 2003 (the “Act”). Section 3 (1) of the Act states that in carrying out its functions, Ofcom shall further the interests of citizens in relation to communications matters, and the interests of consumers in relevant markets, where appropriate by promoting competition.
- 2.4 In this regard, Ofcom considered amongst other things the requirements in section 3 (2) of the Act to secure the availability throughout the UK of a wide range of electronic communications services, and section 3 (4) of the Act, namely, the:
- Desirability of promoting competition in relevant markets;
 - Desirability of promoting and facilitating the development and use of effective forms of self-regulation;
 - Desirability of encouraging investment and innovation in relevant markets;
 - Needs of persons with disabilities, of the elderly and of those on low incomes;
 - Opinions of consumers in relevant markets and of members of the public generally; and,
 - Different interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.
- 2.5 In order to secure the availability throughout the UK of a wide range of electronic communications services, as set out in Section 3(5) of the Act, Ofcom aims to further the interests of consumers by having regard, in particular, to the interests of those End-Users in respect of choice, price, QoS and value for money.
- 2.6 Section 4 of the Act sets out Ofcom’s duties for the purpose of fulfilling its Community obligations. Ofcom has considered, amongst other things, the requirement to

promote competition and the interests of all persons who are citizens of the EU; and the requirement to encourage such compliance with the standards mentioned in Section 4 (10) of the Act as is necessary for, amongst other matters, securing freedom of choice for the customers of the Communications Providers. Section 4 (10) of the Act includes the standards of the European Telecommunications Standards Institute (ETSI). Ofcom considers these are still relevant to this proposed modification.

- 2.7 Ofcom wishes to ensure that the QoS information provided is relevant, accessible and accurate such that End-Users will be in a position to make informed purchasing decisions based on reliable and comparable information. Therefore, as Topcomm has asked for an extra three months without which it does not consider it practical to provide the required information, Ofcom considers it appropriate to consult on extending the time by which fixed providers have to comply with the Direction.

Section 49 and the setting of Directions

- 2.8 Ofcom is required by section 49 of the Act to ensure that any modification to a direction it gives is:

- objectively justifiable in relation to the networks, services, facilities, apparatus or directories to which it relates;
- not unduly discriminatory against particular persons or against a particular description of persons;
- proportionate to what it is relevant to achieve; and,
- transparent in relation to what it is intended to achieve.

- 2.9 Pursuant to section 49 of the Act and General Condition 21.1 in Part 2 of the Schedule to the General Conditions Notification, issued on 22 July 2003 by the Director General of Telecommunications ("the Director"), Ofcom published a Statement and Direction on setting quality of service parameters on 27 January 2005 <http://www.ofcom.org.uk/consult/condocs/qualitystate/statement/#content>.

- 2.10 The Direction requires specified Communications Providers which provide publicly available telephone services ("PATs") over a Public Telephone Network ("PTN") at a fixed location to publish quality of service information covering the following parameters:

- Supply time for initial connection;
- Fault rates per access line;
- Fault repair times;
- Billing correctness complaints; and
- Time taken to resolve End-User complaints received by the Communications Provider to be resolved.

- 2.11 Section 7 of the Explanatory Statement to the January 2005 Direction, sets out the timing of the initiative, which is in three parts:

- the date on which the Direction was published (27 January 2005);
- the date the measurement of the data commences (28 October 2005); and
- publication of the results (on or before 28 April 2006).

Industry progress on implementation

- 2.12 The fixed line Communications Providers have made good progress in the implementation of the Direction. For example:
- A co-regulatory group, Topcomm, has been set up to implement the QoS Direction ;
 - Agreement has been reached on a common testing specification against an agreed set of definitions;
 - Audit procedures have been agreed and a comparability auditor appointed;
 - A website provider has been appointed and work on the development of an independent website for publication of the results is well advanced; and
 - Data collection began on 1 October 2005.
- 2.13 However, despite its best efforts Topcomm considers that the timeframe allocated by Ofcom for implementation is unreasonable. In particular, Topcomm has stated that insufficient time has been allowed for making the necessary changes to systems and processes. Subsequently, it submits that the actual process of data collection has revealed various system and comparability issues as reporting systems are tested for the first time.
- 2.14 On 20 October 2005, Topcomm wrote to Ofcom requesting that Ofcom classify the period of data collection between 1 October and 31 December as a pilot phase, with formal data collection considered to have started on 1 January 2006. Topcomm has proposed that the data for the period January to March 2006 would be published in July 2006, followed by publication of the data for the period April to June in October 2006.
- 2.15 Ofcom is minded to accept Topcomm's proposal for a slight delay to the measurement commencement date, as our primary concern is to ensure that the quality of service parameters benefit consumers. We believe a pilot phase could help to identify process and systems issues that may affect the quality of the data provided. The pilot phase would also provide an opportunity to test the functionality and user-friendliness of the independent website before launching the publication.
- 2.16 In order to address the various issues raised by Topcomm and to align the proposed pilot phase with the requirements of the Direction. Ofcom proposes that the measurement collection date stipulated in the Direction should be amended from nine months to one year, with the first publication of data on or before 28 July 2006.
- 2.17 However, Ofcom still expects the publication of six months of data starting on or before 28 July 2006, and at least six monthly intervals thereafter, as set out in the January 2005 Direction.
- 2.18 Topcomm has indicated it intends to collect data in three monthly batches, Ofcom would welcome proposals for more frequent publication. The existing Direction allows for this.
- 2.19 Topcomm has provided a detailed project plan setting out key milestones for publication in July 2006. Each Communications Provider that is required to comply with the Direction must be able to demonstrate that its processes and procedures are able to deliver to the agreed timescale; otherwise they may be subject to formal investigation by Ofcom.

Proposed modification to the Direction

2.20 In order to facilitate the revised timetable, Ofcom proposes to modify the Direction, published on 27 January 2005 as follows:

- The definition of “Measurement Commencement Date” being modified to mean one year (rather than nine months) from the date the Direction was published, being the date when the Communications Providers begin to accumulate the relevant Quality of Service Parameters data in order to comply with the obligations set out in paragraph 1 of the Direction.

2.21 In proposing this modification to the Direction, Ofcom is satisfied that it meets the tests set out in Section 49 of the Act.

- Ofcom considers that the proposal is **objectively justifiable** in relation to furthering the interests of citizens-consumers in respect of choice, price, quality of service and value for money. Ofcom considers it is practicable to allow for an extended timetable to ensure that the data provided to End-Users is comparable, adequate and up to date.
- Ofcom also considers that its proposals are **not unduly discriminatory** against particular persons, as the proposed modification of the Direction applies equally to all relevant Communications Providers covered by the Direction.
- The proposed modification is **proportionate** to what it is intended to achieve because it allows those affected a greater amount of time to comply and it is intended to enhance the reliability of the output.
- The modification is **transparent** because Ofcom is undertaking a formal consultation as set out at Annex 3.

2.22 The proposed modification of the Direction extends the initial publication of comparable QoS for fixed voice services by a short period of three months. Ofcom does not consider that such a modification requires an impact assessment. Ofcom’s view is that the main objective must be to ensure that the published data is fit for purpose.

Next steps

2.23 Annex 1 set out the notification and proposed modification to the Direction under General Condition 21.1 on Quality of Service, published by Ofcom on 27 January 2005.

2.24 Representations on the proposed modification should be sent to Rosalind Stevens-Strohmman, Ofcom, Riverside House, 2a Southwark Bridge Road, London SE1 9RA by no later than 5.00 pm on Tuesday 28 February 2006.

2.25 All confidential information should be clearly marked as such and separated out into a confidential annex. All representations received will be published, unless it is clearly marked that the response is confidential, and made available in Ofcom’s Knowledge Centre. Please contact Jan Kacperek (jan.kacperek@ofcom.org.uk) for further information with respect to public inspection or, for responses to the draft Direction, visit Ofcom’s website (www.ofcom.org.uk).

Annex 1

Notification

Notification of a proposed modification under section 48 (2) of the Communications Act 2003

Proposal for modifying a Direction given under General Condition 21 in Part 2 of the Schedule to the General Conditions Notification, issued on 22 July 2003, requiring specified Communications Providers which provide Publicly Available Telephone Services over a Public Telephone Network at a fixed location to provide quality service information

1. Ofcom hereby makes, in accordance with section 49 of the Communications Act 2003 (the 'Act'), the following proposal to modify a Direction given under General Condition 21, in Part 2 of the Schedule to the General Conditions Notification, issued on 22 July 2003 by the Director General of Telecommunications (the '**Director**'),
2. The draft modification to the Direction is set out in the Schedule to this notification.
3. The effect of the draft modification to the Direction, and the reasons for making the proposal, are set out in the accompanying explanatory statement.
4. Representation may be made to Ofcom about the proposed draft modification to the Direction by **5 pm on Tuesday, 28 February 2006**.
5. In accordance with section 50 of the Act, copies of this notification have been sent to the Secretary of State, the European Commission and to the regulatory authorities of every other Member State.

Neil Buckley
Competition Policy Director

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

27 January 2006

Schedule

[Draft] Direction modifying a Direction given under section 49 of the Communications Act 2003 and General Condition 21 requiring specified Communications Providers which provide Publicly Available Telephone Services over a Public Telephone Network at a fixed location to provide quality service information

WHEREAS:

- A. the Director General of Telecommunications (the '**Director**') issued on 22 July 2003 the General Conditions Notification, which took effect on 25 July 2003 by way of publication of a notification pursuant to section 48(1) of the Act ("**General Conditions Notification**");
- B. General Condition 21.1 in Part 2 of the Schedule to the General Conditions Notification provides that Communication Providers shall, on the direction of Ofcom, publish comparable, adequate and up to date information for End-Users on the quality of its service;
- C. Ofcom issued a notification on 1 September 2004 pursuant to section 49(4) of the Communications Act 2003 (the '**Act**') of a proposal to give a Direction under Condition 21.1 directing the appropriate quality of service information to be published (the '**Notification**');
- D. in the Notification and accompanying explanatory statement, Ofcom invited representations about any of the proposals therein by 4 October 2004;
- E. a copy of the Notification was sent to the Secretary of State, the European Commission and to the regulatory authorities of every other Member State as Ofcom considered it appropriate to do so in accordance with section 50 of the Act;
- F. Ofcom received responses to the Notification and having considered every such representation made to them in respect of the proposals set out in the Notification gave a Direction under section 49 of the Communications Act 2003 and General Condition 21 requiring specified Communications Providers which provide Publicly Available Telephone Services over a Public Telephone Network at a fixed location to provide quality service information (the '**Direction**');
- G. on 27 January 2006, Ofcom published a notification of their proposal to modify the Direction, in accordance with section 49 of the Act (the "**January 2006 Notification**");
- H. a copy of the January 2006 Notification was sent to the Secretary of State, the European Commission and the regulatory authorities at every Member State in accordance with section 50 of the Act;
- I. in the January 2006 Notification and accompanying explanatory statement, Ofcom invited representations about the proposal therein by 28 February 2006;
- J. by virtue of section 49(9) of the Act, OFCOM may give effect to the proposal set out in the January 2006 Notification, with or without modification, only if
- a) they have considered every representation about the proposal that is made to them within the period specified in the January 2006 Notification; and
 - b) they have had regard to every international obligation of the United Kingdom (if any) which has been notified to them for this purpose by the Secretary of State;

K. for the reasons set out in the explanatory statement accompanying this modified Direction, Ofcom are satisfied that, in accordance with section 49(2) of the Act, this Direction is:

- (i) objectively justifiable in relation to the networks, services, facilities, apparatus or directories to which it relates;
- (ii) not such as to discriminate unduly against particular persons or against a particular description of persons;
- (iii) proportionate to what it is intended to achieve; and
- (iv) in relation to what it is intended to achieve, transparent;

L. for the reasons set out in the explanatory statement accompanying this modified Direction, Ofcom have considered and acted in accordance with the relevant requirements set out in sections 4 of the Act and their duties in section 3 of the Act;

M. Ofcom has considered every representation about the proposed modified Direction duly made to them and these representations are discussed in the statement accompanying this modified Direction; and the Secretary of State has not notified OFCOM of any international obligation of the United Kingdom for this purpose;

NOW, therefore, pursuant to section 49 of the Communications Act 2003 and General Condition 21, OFCOM hereby gives the following modification to the Direction requiring specified Communications Providers which provide Publicly Available Telephone Services over a Public Telephone Network at a fixed location to provide quality service information

1. The words “nine months” in the definition of Measurement Commencement Date in paragraph 5 (g) of the Direction are deleted and replaced by the words “one year”. Thus, the definition of Measurement Commencement Date in paragraph 5 (g) of the Direction is as follows:

“(g) **“Measurement Commencement Date”** means one year from the date this Direction is published, being the date when a Communications Providers begins to accumulate the relevant Quality of Service Parameters data in order to comply with the obligations set out in paragraph 1 above;”

2. Except insofar as the context otherwise requires, words or expressions shall have the meaning assigned to them in the Notification and otherwise any word or expression shall have the same meaning it has in the General Conditions Notification (including in the Annexes) and otherwise any word or expression shall have the same meaning as it has in the Act.

3. For the purpose of interpreting this Direction:

- a) headings and titles shall be disregarded; and
- (b) the Interpretation Act 1978 (c. 30) shall apply as if this Direction were an Act of Parliament.

4. This Direction shall take effect on the day it is published.

[Name]

[Title]

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

[Date']

Annex 2

Responding to this consultation

How to respond

Ofcom invites written views and comments on the issues raised in this document, to be made by **5pm on 28 February 2006**.

Ofcom strongly prefers to receive responses as e-mail attachments, in Microsoft Word format, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 2), among other things to indicate whether or not there are confidentiality issues. The cover sheet can be downloaded from the 'Consultations' section of our website.

Please can you send your response to first Rosalind.stevens-strohmann@ofcom.org.uk.

Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.

Rosalind Stevens-Strohmann
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Fax: 020 7981 3333

Note that we do not need a hard copy in addition to an electronic version. Also note that Ofcom will not routinely acknowledge receipt of responses.

It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 3. It would also help if you can explain why you hold your views, and how Ofcom's proposals would impact on you.

Further information

If you have any want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Rosalind Stevens-Strohmann on 020 7783 4339.

Confidentiality

Ofcom thinks it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt (when respondents confirm on their response cover sheet that this is acceptable).

All comments will be treated as non-confidential unless respondents specify that part or all of the response is confidential and should not be disclosed. Please place any confidential parts of a response in a separate annex, so that non-confidential parts may be published along with the respondent's identity.

Ofcom reserves its power to disclose any information it receives where this is required to carry out its legal requirements. Ofcom will exercise due regard to the confidentiality of information supplied.

Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use, to meet its legal requirements. Ofcom's approach on intellectual property rights is explained further on its website, at www.ofcom.org.uk/about_ofcom/gov_accountability/disclaimer.

Next steps

Following the end of the consultation period, Ofcom intends to publish a statement in March 2006.

Please note that you can register to get automatic notifications of when Ofcom documents are published, at http://www.ofcom.org.uk/static/subscribe/select_list.htm.

Ofcom's consultation processes

Ofcom is keen to make responding to consultations easy, and has published some consultation principles (see Annex 2) which it seeks to follow, including on the length of consultations.

If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk. We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, whose views are less likely to be obtained in a formal consultation.

If you would like to discuss these issues, or Ofcom's consultation processes more generally, you can alternatively contact Vicki Nash, Director, Scotland, who is Ofcom's consultation champion:

Vicki Nash
Ofcom (Scotland)
Sutherland House
149 St. Vincent Street
Glasgow G2 5NW
Tel: 0141 229 7401
Fax: 0141 229 7433
E-mail: vicki.nash@ofcom.org.uk

Annex 3

Ofcom's consultation principles

A3.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A3.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A3.3 We will be clear about who we are consulting, why, on what questions and for how long.

A3.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened version for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A3.5 We will normally allow ten weeks for responses to consultations on issues of general interest.

A3.6 There will be a person within Ofcom who will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. This individual (who we call the consultation champion) will also be the main person to contact with views on the way we run our consultations.

A3.7 If we are not able to follow one of these principles, we will explain why. This may be because a particular issue is urgent. If we need to reduce the amount of time we have set aside for a consultation, we will let those concerned know beforehand that this is a 'red flag consultation' which needs their urgent attention.

After the consultation

A3.8 We will look at each response carefully and with an open mind. We will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 4

Consultation response cover sheet

- A4.1 In the interests of transparency, we will publish all consultation responses in full on our website, www.ofcom.org.uk, unless a respondent specifies that all or part of their response is confidential. We will also refer to the contents of a response when explaining our decision, without disclosing the specific information that you wish to remain confidential.
- A4.2 We have produced a cover sheet for responses (see below) and would be very grateful if you could send one with your response. This will speed up our processing of responses, and help to maintain confidentiality by allowing you to state very clearly what you don't want to be published. We will keep your completed cover sheets confidential.
- A4.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their cover sheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A4.4 We strongly prefer to receive responses in the form of a Microsoft Word attachment to an email. Our website therefore includes an electronic copy of this cover sheet, which you can download from the 'Consultations' section of our website.
- A4.5 Please put any confidential parts of your response in a separate annex to your response, so that they are clearly identified. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Direction under General Condition 21.1 on Quality of Service: Proposed modification

To : Rosalind Stevens-Strohmann

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

☐

Name/contact details/job title

☐

Whole response

☐

Organisation

☐

Part of the response

☐

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

☐

Name

Signed (if hard copy)