



Rosalind Stevens- Strohman  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

[Rosalind.stevens-strohman@ofcom.org.uk](mailto:Rosalind.stevens-strohman@ofcom.org.uk)

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Dear Rosalind

[Quality of Service: Direction under General Condition 21.1 on Quality of Service](#)

The Federation of Communication Services is the trade association for the communication services industry, representing businesses delivering products and services by means of fixed telephony, mobile and radio based technology. A full list of our members may be found on the website [www.fcs.org.uk](http://www.fcs.org.uk).

Several of our members fall within the parameters of GC21.1 or may do so in the future and we have become involved with the development of the QoS project and the co-regulatory group to represent their interests.

Representatives from FCS have regularly attended meetings of the Quality of Service co-regulatory group (now known as Topcomm) since it was set up and have had first hand involvement in the work of the group. In our view the substantial progress which has been made to date has been achieved as a result of the considerable commitment and hard work of the participating member companies.

The tasks facing the group have been demanding; it has been necessary to agree definitions, comparability of auditing processes and arrangements for publication. This has been made more complex by the widely differing types of business and associated services which are involved in the group.

One of the factors which initially absorbed considerable time and effort was the establishment of the co-regulatory group itself and we believe that insufficient time was allowed in the overall timetable for this. Specifically, we feel that there needed to be a clearer division of responsibility between the co-regulatory body and Ofcom and greater effort to ensure participation of all companies affected from the outset. We feel that it would be useful to review the experience gained from this project and the lessons learned for the creation of similar co-regulatory bodies in the future.

In conclusion, we fully support the proposed extension to the publication deadline which will treat data collected during the period October-December 2005 as test data and delay publication of first results until July 2006. We believe that this opportunity to resolve problems associated with implementation in the pilot will lead to much better quality of data at initial publication.

Yours sincerely

**Jacqui Brookes**  
CEO

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**The Federation of Communication Services Ltd**

Burnhill Business Centre, Provident House, Burrell Row, Beckenham, Kent BR3 1AT

**Tel:** 020 8249 6363 **Fax:** 0870 120 5927 **E-mail:** [fcs@fcs.org.uk](mailto:fcs@fcs.org.uk) **Web:** [www.fcs.org.uk](http://www.fcs.org.uk)

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