



Telewest Response - Ofcom Direction under GC 21.1 on Quality of Service modification

1. Summary:

Ofcom's proposal to extend the date, by which Communications Providers (CPs) are required to publish Quality of Service (QOS) information, to 28 July 2006 is supported by ¹Telewest Broadband – but see comments below.

2. General comments

- 2.1 It has become apparent from the industry forum set up to manage the introduction of QOS information (Topcomm), that it is highly unlikely that the overall process would be sufficiently robust to be able to meet the original timetable for publication, with the required level of confidence in the published data. Telewest considers it is therefore preferable for Ofcom to accept the reality of the current situation, and propose a more realistic extended timetable, than push ahead with the original date. It is worth recognising however, that even this revised date may still cause problems for some CPs.
- 2.2 The underlying assumption in the introduction of the new reporting process is that the information made available publicly will enable consumers to make better informed decisions in their choice of communications supplier. Inherent in this belief is a need to ensure that the information provided is as reliable as the industry can make it. Rushing to meet an unrealistic timetable would not be conducive to achieving this aim, and is likely to deliver only partial information and hence significantly reduced potential value for consumers.
- 2.3 The development and implementation of the new process is for some CPs a significant activity both in terms of practical challenge and cost. It is not surprising therefore that the original timetable has become unachievable. Even for those CPs involved in, and used to, the old CPI process, the new scheme has not been without its difficulties and challenges. It should be noted that Telewest expects to publish relevant data by the July date.
- 2.4 Telewest still has concerns, however, over the ultimate value of this information to consumers. While we fully support the general principle of better informed consumers - and will play our full part in helping deliver this - it would be very helpful to see detailed quantification that information on QOS data, as is being published under the new Ofcom scheme, will be of real benefit. There was no significant evidence from the old CPI scheme that the information was of any value to consumers in general. No doubt ongoing reviews of the scheme in operation will enable a clearer picture to emerge on this issue.
- 2.5 Assuming the scheme continues, however, then it is important that all relevant CPs offering public services are required to participate within a reasonable timescale, including the emergent VOiP new voice services suppliers. Limiting the scheme to existing fixed line CPs (whether infrastructure owners or CPS/WLR providers) would only provide a reduced picture to consumers. Ofcom is encouraging NVS market entry and diversity in competition and so should encourage all CPs to participate in the QOS scheme.

¹ *Telewest Communications, the broadband communications and media group, currently passes 4.7 million homes and provides multi-channel television, telephone and both switched and broadband internet services to 1.8 million UK households, and voice and data telecommunications services to around 74,000 business customers. Its content division, Flextech TV, is the BBC's partner in UKTV. Together they are the largest supplier of basic channels to the UK pay-TV market with a portfolio that combines wholly owned and managed channels, including the ten joint venture channels with the BBC.*

QOS modification

Telewest would be happy to discuss any aspect of this response with Ofcom.

Telewest Broadband

01 March 2006

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 (Ofcom contact): Rosalind Stevens-Strohmann

Name of respondent: Bryan Petch

Representing (self or organisation/s): Telewest Broadband

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?

As specified in the document.

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 Bryan Petch

Signed (if hard copy)