



**Notification under Section 110 of the  
Communications Act 2003 in relation to a  
contravention of Regulation 16 of the  
Electronic Communications Code (Conditions  
and Restrictions) Regulations 2003**

Notice served on Infolines Public Networks Limited

Publication Date:

24 August 2006

**NOTIFICATION TO INFOLINES PUBLIC NETWORKS LIMITED (“INFOLINES”)  
UNDER SECTION 110 OF THE COMMUNICATIONS ACT 2003 OF  
CONTRAVENTION OF REGULATION 16(1) OF THE ELECTRONIC  
COMMUNICATIONS CODE (CONDITIONS AND RESTRICTIONS) REGULATIONS  
2003**

**Ofcom’s determination**

1. Ofcom hereby determines that there are reasonable grounds for believing that Infolines has contravened and is contravening Regulation 16(1) of The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (“the Regulations”). Specifically:
  - a. Infolines is a Code operator for the purposes of the Regulations as defined therein.
  - b. Infolines has an obligation under Regulation 16(1)(a) to ensure that sufficient funds are available to meet the specified liabilities which (i) arise on or before the date on which a relevant event occurs, or (ii) may arise at any time during the liability period, from the exercise of rights conferred upon the Code operator by paragraph 9 of the electronic communications code.
  - c. Infolines has an obligation under Regulations 16(1)(b) and 16(6) to provide Ofcom on 1<sup>st</sup> April each year with a certificate attesting that it has fulfilled its duty under Regulation 16(1)(a) accompanied by copies of any insurance policy, bond or guarantee or other instrument which will provide the funds referred to in Regulation 16(1)(a).
  - d. Infolines has failed to provide Ofcom with a certificate attesting that it has fulfilled its duty under Regulation 16(1)(a) (in contravention of Regulation 16(1)(b)) for the years to 1<sup>st</sup> April 2004, 1<sup>st</sup> April 2005 and 1<sup>st</sup> April 2006.
  - e. Infolines has failed to provide Ofcom with copies of any insurance policy, bond or guarantee or other instruments which will provide the funds referred to in Regulation 16(6) (in contravention of Regulation 16(6)).

The reasons for Ofcom’s determination are set out in the explanatory statement accompanying this Notification.

**Regulation**

2. Section 110 of the Communications Act 2003 (“the Act”) allows Ofcom to issue a notification to a person where Ofcom has reasonable grounds for believing that a person is contravening, or has contravened, a requirement imposed by virtue of any restriction or conditions set under section 109 of the Act.
3. Section 109 of the Act grants the Secretary of State the power to make the application of the electronic communications code in any person’s case subject to restrictions and conditions.
4. On 3 October 2003, the Secretary of State laid the Regulations before Parliament making the application of the electronic communications code in any person’s case subject to conditions and restrictions. The Regulations came into force on 23 October 2003.
5. Regulation 16(1) requires that:

*“(1) A code operator must –*

- (a) ensure that sufficient funds are available to meet the specified liabilities which –
- (i) arise on or before the date on which a relevant event occurs, or
  - (ii) may arise at any time during the liability period,
- from the exercise of rights conferred upon the code operator by paragraph 9 of the electronic communications code;
- (b) on 1st April each year, provide OFCOM with the certificate the requirements of which are set out in paragraphs (2) to (6) inclusive unless he has not previously exercised any rights conferred by the electronic communications code; and
- (c) where he has not previously exercised any rights conferred by the electronic communications code and intends to exercise such rights for the first time, provide OFCOM with the said certificate two weeks before he exercises such rights to install any apparatus.”

### **Action required by Infolines**

6. Infolines is required to comply with Regulation 16(1) by:
- a. ensuring that it puts in place sufficient funds to meet the specified liabilities which may arise from the exercise of rights conferred upon it by paragraph 9 of the electronic communications code as required by 16(1)(a) of the Regulations;
  - b. providing Ofcom with a certificate confirming that it has put in place sufficient funds and ensure that it does so in the manner specified by 16(2) to 16(6) of the Regulations; and
  - c. remedying any consequences of its breach of Regulation 16(1).
7. In accordance with the statutory period set out in section 110(4) of the Act, Infolines has until 25 September 2006 in which to comply with this Notification and/or to make representations to Ofcom about matters contained in it.
8. If Infolines does not comply with Regulation 16(1) as set out in this Notification, Ofcom may issue an enforcement notification under section 111 of the Act and/or may impose a penalty on Infolines under section 112 of the Act.

### **Interpretation**

9. Words or expressions used in this Notification have the same meaning as in the Regulations or the Act except as otherwise stated in this Notification.

**David Stewart**  
**Director of Investigations**

**22 August 2006**



# Contents

Section		Page
1	Explanatory Statement	5
2	Ofcom's investigation and reasoning	7
3	Conclusions	10
Annex		Page
1	Ofcom correspondence	11

## Section 1

# Explanatory Statement

## Summary

- 1.1 The Electronic Communications Code ("the Code") is set out in Schedule 2 to the Telecommunications Act 1984 as amended by Schedule 3 to the Communications Act 2003 (the Communications Act 2003 is referred to hereinafter as the "Act"). It sets out the powers that can be given to providers of electronic communications networks ("ECNs") and providers of conduit systems available for use by providers of ECNs to enable them to install and maintain electronic communications apparatus. Code powers allow operators to benefit from certain exemptions under Town and Country Planning legislation and also entitle them to carry out street works under the New Road and Street Works Act 1991 or, in Northern Ireland, the Street Works (Northern Ireland) Order 1995 (together "the NRSWA 1991") without needing to apply for a licence to do so.
- 1.2 Section 106 of the Act allows Ofcom to apply Code powers to providers of ECNs and providers of conduit systems available for use by providers of ECNs. This is done by way of a direction under section 106 of the Act. For those granted Code powers when the licensing regime was still in force, paragraph 17 of Schedule 18 to the Act deems those persons to have been granted Code powers by way of a direction from Ofcom under section 106.
- 1.3 On 1 September 2000, the Secretary of State granted Infolines Public Networks Limited ("Infolines") a licence under section 7 of the Telecommunications Act 1984 (the "1984 Act") authorising Infolines to run a telecommunications system (as defined in the 1984 Act) and applying the Code to Infolines. As set out above, following the entry into force of the Act, Infolines is treated as a person in whose case the Code applies by virtue of a direction under section 106 of the Act ("a Code operator").

## The Code

- 1.4 As set out above, Code operators benefit from certain rights and certain exemptions under planning legislation. One of the rights granted to Code operators is a right to install apparatus for the purposes of running their electronic communications network on, under or over public highways without needing a specific licence to do so under the NRSWA 1991. However, as a quid pro quo for the ability to carry out street works, Code operators are required to put in place funds to meet any specified liabilities.

## Funds to meet liabilities

- 1.5 Under section 109(1) of the Act, the Secretary of State may make the effect of the Code subject to such conditions and restrictions as may be contained in regulations and the Code would have effect in a person's case under section 106 of the Act subject to any such conditions and restrictions.
- 1.6 In the exercise of her powers under section 109(1) of the Act, on 2 October 2003, the Secretary of State issued Statutory Instrument (SI) 2003 No. 2553 The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (the "Regulations").

- 1.7 Regulation 16(1)(a) requires Code operators to ensure that sufficient funds are available to meet specified liabilities arising from the exercise of rights conferred upon them by paragraph 9 of the Code upon the occurrence of a relevant event<sup>1</sup>. Paragraph 9 of the Code allows Code operators to carry out street works without needing a specific licence to do so under the NRSWA 1991. Such funds could be demanded by appropriate authorities to cover costs or expenses reasonably incurred in removing any electronic communications apparatus following the occurrence of a relevant event.
- 1.8 In order to ensure that Code operators have complied with their duty under Regulation 16(1)(a), they are required by Regulation 16(1)(b) to send Ofcom a certificate by 1<sup>st</sup> April every year certifying that sufficient funds are available and to send Ofcom copies of any insurance policy, bond, guarantee or other instrument which will provide for the funds.
- 1.9 Ofcom has never received a certificate or accompanying documentation from Infolines under Regulation 16 and Infolines has therefore failed to comply with the restrictions and conditions set out in those Regulations.
- 1.10 Section 110 of the Act sets out the procedure that Ofcom must follow in commencing enforcement action in relation to any conditions and restrictions imposed by the Secretary of State under section 109 of the Act. Section 110 states that Ofcom may issue a notification to a Code operator where it has reasonable grounds for believing that that person is contravening, or has contravened, a requirement imposed by virtue of any restrictions or conditions under section 109.
- 1.11 For the reasons set out in this notification, Ofcom has reasonable grounds for believing that Infolines is contravening, and has contravened the restrictions and conditions contained in Regulation 16.
- 1.12 Ofcom therefore hereby serves a Notification on Infolines requiring it to:
- a) ensure that it puts in place sufficient funds to meet the specified liabilities which may arise from the exercise of rights conferred upon it by paragraph 9 of the Code as required by 16(1)(a) of the Regulations;
  - b) provide Ofcom with a certificate confirming that it has put in place sufficient funds and ensure that it does so in the manner specified by 16(2) to 16(6) of the Regulations; and
  - c) remedy any consequences of its breach of Regulation 16.
- 1.13 In accordance with the statutory period set out in section 110(4) of the Act, Infolines has until **25 September 2006** in which to make representations to Ofcom about matters contained in this Notification and the accompanying explanatory statement.
- 1.14 If Infolines does not comply with the Regulations by meeting the requirements of the Regulations in full, and/or does not remedy any consequences of its breach, Ofcom may issue an enforcement notification under section 111 of the Act and/or may impose a penalty under section 112 of the Act.

---

<sup>1</sup> "Relevant Event" is defined in paragraph 10 of Regulation 16 of The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and, in short, refers to a Code operator ceasing to trade.

## Section 2

# Ofcom's investigation and reasoning

## Background

- 2.1 The Code grants Code operators various powers to install and maintain electronic communications networks. Amongst other things, Code operators:
- have the power to install apparatus in, under or over streets without needing a specific licence to do so under the NRSWA 1991;
  - benefit from important exemptions under Town and Country Planning legislation in the form of Permitted Development; and
  - have the right to apply to the Court conferring a right, where agreement cannot be reached, to execute works on private land.
- 2.2 On 1 September 2000, the Secretary of State granted Infolines a licence under section 7 of the 1984 Act authorising Infolines to run a telecommunications system (as defined in the 1984 Act) and applying the Code to Infolines. As set out above, following the entry into force of the Act, Infolines is treated as a Code operator by virtue of paragraph 17 of Schedule 18 to the Act.

## Funds for liabilities and Regulation 16

- 2.3 Streets or, in Scotland, roads ("public highways") are run by appropriate authorities and traffic authorities (the "authorities") and these authorities are responsible, amongst other things, for ensuring that public highways are kept in a good state of repair and accessible. In general, therefore, it is necessary for anyone wishing to place anything on public highways or wishing to break up public highways to seek a specific licence to do so under the NRSWA 1991. This allows the authorities to control who is permitted to place apparatus of any description on public highways and who can break up or open public highways.
- 2.4 However, Code operators do not have to seek a specific licence to access public highways and they are therefore permitted, amongst other things, to install and maintain apparatus that are on, under, over or across public highways. Code operators' right or privilege to access public highways could therefore leave authorities to remove any apparatus and incur the costs for doing so unless provisions were put in place to ensure that Code operators are in a position to meet liabilities for the removal of apparatus in the event that they ceased to operate. This is precisely the aim of the funds for liabilities regime.
- 2.5 The Regulations were issued on 2 October 2003 under section 109(1) of the Act. Regulation 16(1)(a) requires Code operators to ensure that sufficient funds are available to meet specified liabilities arising from the exercise of rights conferred upon them by paragraph 9 of the Code upon the occurrence of a relevant event. Paragraph 9 is the part of the Code which allows Code operators to carry out street works under the NRSWA 1991.
- 2.6 Specified liabilities are defined in the Regulations as, amongst other things, costs or expenses reasonably incurred by an authority in making good any damage caused by the installation or removal of electronic communications apparatus. By virtue of



Regulation 16(1)(a), Code operators must therefore ensure that sufficient funds are available to meet those specified liabilities.

- 2.7 Regulation 16 contains a number of provisions containing specific requirements in relation to ensuring that Code operators have sufficient funds available to meet specified liabilities as follows:
- 16(1)(a) of the Regulations contains the general provision requiring Code operators to ensure that sufficient funds are available to meet specified liabilities;
  - 16(1)(b) of the Regulations requires Code operators to provide Ofcom with a certificate on 1<sup>st</sup> April each year;
  - 16(2)(a) of the Regulations states that, in the case of a company, the certificate must be signed by the director or a company secretary;
  - 16(3) of the Regulations states that the certificate shall include a statement that in the reasonable opinion of the board, in the case of a company, that the Code operator has fulfilled his duty to put in place sufficient funds to meet any liabilities;
  - 16(5)(a) of the Regulations requires Code operators to state on the certificate the amount of the funds which have been provided for; and
  - 16(6) of the Regulations states that the certificate shall be accompanied by a copy of any insurance policy, bond, guarantee or other instrument which will provide for the funds.

## Infolines

- 2.8 Ofcom understands that Infolines' primary business relates to the provision of public payphones including managed payphones and private payphones. One of the differences between these different definitions of payphone is that that the former set is likely to be on public highways or likely to be located at transport hubs (managed payphones) whereas private payphones are likely to be located at private establishments. In terms of the Regulations, payphones located on public highways are relevant and should be covered by the funds for liabilities regime.
- 2.9 As explained in paragraph 2.2, Infolines, as a Code operator, is required to comply with the conditions and restrictions set out in the Regulations. The Regulations came into effect on 2 October 2003. Ofcom should therefore have received certificates from Infolines on 1 April 2004, 1 April 2005 and 1 April 2006. It has not received one of these certificates and nor has it received an explanation directly from the company as to why this is the case.
- 2.10 Ofcom should not need to contact Code operators to ask them to meet the requirements of the Regulations. Ofcom has, nonetheless, written formally to Infolines on three occasions (see Annex 1) and has also tried to contact Infolines via email and telephone.
- 2.11 Despite these repeated attempts to ensure that Infolines complies with its obligations under Regulation 16, Ofcom has not received a certificate from Infolines as required by paragraph 16(1)(b) of the Regulations nor has it received any accompanying documentation.

2.12 For these reasons, Ofcom has reasonable grounds to believe that Infolines is contravening the Regulations. Ofcom has, therefore, decided to issue a notification under section 110 of the Act.

## Section 3

# Conclusions

### Next steps

- 3.1 As explained in paragraph 2.2, Infolines is a Code operator and, as such, is required to meet the requirements set out in the Regulations including its duties under Regulation 16(1). Ofcom has not, however, received a certificate from Infolines as required by Regulation 16(1)(b) nor has it received any relevant accompanying documentation. Ofcom considers, therefore, that it has reasonable grounds to believe that Infolines has contravened, and is continuing to contravene, the Regulations.
- 3.2 Infolines is required to comply with Regulation 16. Specifically it must:
  - a) ensure that it puts in place sufficient funds to meet the specified liabilities which may arise from the exercise of rights conferred upon it by paragraph 9 of the Code as required by 16(1)(a) of the Regulations;
  - b) provide Ofcom with a certificate confirming that it has put in place sufficient funds and ensure that it does so in the manner specified by 16(2) to 16(6) of the Regulations; and
  - c) remedy any consequences of its breach of Regulation 16(1).
- 3.3 In accordance with the statutory period set out in section 110(4) of the Act, Infolines has until **25 September 2006** in which to comply with the Notification and/or make representations to Ofcom about matters contained in the Notification and the accompanying explanatory statement.
- 3.4 If Infolines does not comply with Regulation 16(1) as set out in the Notification, and/or does not remedy any consequences of its breach of Regulation 16, Ofcom may issue an enforcement notification under section 111 of the Act and/or may impose a penalty under section 112 of the Act.

## Annex 1

# Ofcom correspondence

### Request for action

- A1.1 Ofcom has sent Infolines three letters in relation to the funds for liabilities none of which, as far as Ofcom is aware, has been acted upon. Neither has Ofcom received a response from Infolines to any of these letters. Each of these letters is set out below:

22 June 2005

Mr P Pearson  
Infolines Public Network Ltd  
The White House Limited  
Lichfield Street  
Tamworth  
Staffordshire  
B77 1PG

MICHAEL GALVIN

Direct line: 020 7783 4158

Direct fax:

michael.galvin@ofcom.org.uk

Dear Mr Pearson

**Regulation 16: Funds for liabilities**

1. I am writing further to our letter of 11 February 2005 in which we set out Infolines Public Networks Ltd's duties under the Electronic Communications Code (Conditions & Restrictions) Regulations 2003, Regulation 16: Funds for meeting liabilities ("Regulation 16"). Our records show that you have not provided us with the relevant documentation required by Regulation 16.
2. This letter, therefore, constitutes further notice of your obligations under Regulation 16. You should be aware that Ofcom may take enforcement action under its powers which are set out in sections 110 to 112 of the Communications Act 2003.
3. For ease of reference, you are required to:
  - "ensure that sufficient funds are available to meet specified liabilities" (Regulation 16(1)(a));
  - "on 1<sup>st</sup> April each year, provide OFCOM with the certificate the requirements of which are set out in paragraphs (2) to (6)" (Regulation 16(1)(b)); and
  - "[with the certificate, provide] copies of any insurance policy, bond, guarantee or other instrument which will provide the funds in paragraph 1(a)" (Regulation 16(6)).
4. We intend to publish on our website a list of all operators who have failed to fulfil their duties under Regulation 16. At this stage, we are intending to include your company's name on the list.
5. However, Infolines Public Networks Ltd's will not be included on the list of operators who have failed to fulfil their duties under Regulation 16 if we receive the documentation required before we publish any list.
6. I should reiterate that you are required to provide us with this documentation under Regulation 16.

7. Please contact me on 020 7783 4158 should you wish to discuss this matter or via email to [michael.galvin@ofcom.org.uk](mailto:michael.galvin@ofcom.org.uk).

Yours sincerely

MICHAEL GALVIN

11 February 2005

Mr P Pearson  
Infolines Public Network Ltd  
The White House  
Lichfield Street  
Tamworth  
Staffordshire  
B77 1PG

FAO – Mr Pearson

Dear Mr Pearson

**Regulation 16 of the Electronic Communications Code (Conditions & Restrictions) Regulations 2003: Funds for meeting liabilities**

1. Infolines Public Network Ltd ("Infolines") is a person to whom the Electronic Communications Code (as defined in section 106(1) of the Communications Act 2003 (the "Act")) applies by a direction under section 106(3) of the Act and is therefore a code operator as defined in paragraph 2(2) of the Electronic Communications Code (Conditions & Restrictions) Regulations 2003 (the "Regulations"). Infolines is therefore required, by paragraph 16(1)(a) of the Regulations, to ensure that sufficient funds are available to meet the specified liabilities as defined in the Regulations, which may arise from the exercise of rights by Infolines under paragraph 9 of the Electronic Communications Code.
2. Where Infolines has previously exercised its rights under the Electronic Communications Code, the Regulations require Infolines to:
  - provide Ofcom with a certificate on 1<sup>st</sup> April each year (paragraph 16(1)(b)), which should be signed by a director or company secretary of Infolines, and approved by a resolution of the board of Infolines (paragraph 16(2));
  - state on the above-mentioned certificate that in the reasonable opinion of the Board of Infolines, Infolines has fulfilled its duty under paragraph 16(1)(a) (paragraph 16(3)(a)) (and the Board must not make that statement unless it has first made appropriate enquiries into whether Infolines has fulfilled its duty under Regulation 16(1)(a));
  - state on the certificate the amount of funds that have been provided for (paragraph 16(5)(a), and the systems and processes which enabled the Board to form the opinion referred to in Regulation 16(3) (Regulation 16(5)(b)); and
  - provide with the certificate copies of the insurance policy, bond, guarantee or other instrument which will provide the funds (Regulation 16(6)).
3. Where Infolines has not previously exercised any rights conferred by the Electronic Communications Code, it is required to provide Ofcom with such a certificate two weeks before it exercises such rights (Regulation 16(1)(c)). For ease of reference, I attach a copy of Regulation 16. You might also wish to read the statement entitled *Funds for liabilities*, which we published in October 2003 and is available via the following website link (<http://www.ofcom.org.uk/static/archive/oftel/publications/licensing/2003/funds1003.pdf>).
4. Despite this, Ofcom does not have any record of receipt of the relevant certificate and instrument confirming that Infolines has put in place sufficient funds to meet any liabilities

and nor does it have any record that states that Infolines has not exercised the powers conferred on it by the Electronic Communications Code. In the former case, Ofcom should have received these documents on 1<sup>st</sup> April 2004 and the next certificate will be due on 1<sup>st</sup> April 2005. This is, therefore, of increasing concern to us.

5. Please, therefore, provide Ofcom with the relevant certificate and instrument within the next two weeks or advise us whether or not Infolines has utilised code powers. If Infolines fails to discharge its duties, Ofcom will take formal enforcement action against you under sections 110-114 of the Communications Act 2003.

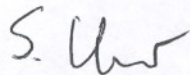
6. You should send the relevant certificate and instrument to Michael Galvin at:

Office of Communications  
Competition and Markets  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

7. Alternatively, if Infolines has not utilised its Code powers and nor does it intend to do so, it can apply to Ofcom for the revocation of those powers. Ofcom would then issue a Notification of its proposals to revoke the Code powers for consultation under section 107(6) of the Communications Act 2003, and then, subject to any comments received, revoke Infolines's Code powers by further direction under section 106 of the Act. This should again be sent to the above address.

8. Any enquiries regarding this letter should be directed to Michael Galvin on 020 7783 4158 or by e-mail to [michael.galvin@ofcom.org.uk](mailto:michael.galvin@ofcom.org.uk)

Yours sincerely,



STEVE UNGER  
DIRECTOR OF TELECOMS TECHNOLOGY  
COMPETITION AND MARKETS



2 April 2004

Infolines Public Networks Ltd  
Mr P Pearson  
The White House  
Lichfield Street  
Tamworth  
Staffs  
B77 1PGB

Dear Mr. Pearson,

### **Funds for liabilities**

I am writing to you with regard to the obligation on Code Operators to put in place funds for liabilities under Regulation 16 of the Electronic Communications Code Regulations 2003 (the 'Regulations').

A full explanation of the legal obligation is set out in the Statement on Funds for Liabilities, which was published by Ofcom on 15 October 2003 and which is available at: [www.ofcom.org.uk/static/archive/oftel/publications/licensing/2003/funds1003.pdf](http://www.ofcom.org.uk/static/archive/oftel/publications/licensing/2003/funds1003.pdf)

As set out in that statement, on 1<sup>st</sup> April of each year, Code Operators have to provide Ofcom with a certificate unless they have not exercised any rights conferred by the electronic communications code (the code). A specimen certificate is annexed to the Statement on Funds for Liabilities.

In addition, Code Operators also have to supply Ofcom with a copy of the financial instrument which has been put in place for the purposes of Regulation 16. A specimen bond for the purposes of Regulation 16 is available at: [www.ofcom.org.uk/licensing\\_numbering/tele\\_gen\\_auth/g\\_a\\_regime/ffl/spec\\_bond.pdf](http://www.ofcom.org.uk/licensing_numbering/tele_gen_auth/g_a_regime/ffl/spec_bond.pdf)

To assist Code Operators, Ofcom has published guidelines on how to assess liabilities for the purposes of Regulation 16. The guidelines are available at: [www.ofcom.org.uk/licensing\\_numbering/tele\\_gen\\_auth/g\\_a\\_regime/ffl/funds\\_liability.pdf](http://www.ofcom.org.uk/licensing_numbering/tele_gen_auth/g_a_regime/ffl/funds_liability.pdf)

The 1<sup>st</sup> April deadline has now passed, and we do not seem to have any record of a copy of the certificate and bond being supplied to us or any notification that you are in the process of finalising these documents.

I would be grateful if you could either provide the relevant documents or confirm to Christina Spyrelli the steps that you are taking to put funds for liabilities in place. Could you please supply such details by close of business on Friday, **30 April 2004**.

Should you have any queries, please contact Christina Spyrelli on 020 7783 4312 or by e-mail: [christina.spyrelli@ofcom.org.uk](mailto:christina.spyrelli@ofcom.org.uk)

All the requested information should be sent to Christina Spyrelli by e-mail to [christina.spyrelli@ofcom.org.uk](mailto:christina.spyrelli@ofcom.org.uk) or by post to:

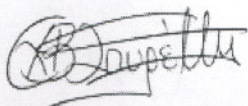
Office of Communications  
Riverside House  
2A, Southwark Bridge Road  
London  
SE1 9HA

Thank you in advance for your prompt attention to this matter.

Yours sincerely,

Neil Buckley  
Head of Consumer Policy

pp. Christina Spyrelli

A handwritten signature in black ink, appearing to read 'Christina Spyrelli', with a horizontal line drawn underneath it.