

## R E S P O N S E

AUTHOR: UNITECH

DATE: 13/03/04

SUBJECT: REPORTING QUALITY OF SERVICE INFORMATION TO CONSUMERS:

A CONSULTATION ON THE REGULATORY OPTIONS FOR ACQUIRING AND PUBLISHING QUALITY OF SERVICE MEASURES FOR TELECOMMUNICATION SERVICES

**1. INTRODUCTION**

For the past 4 years, UniTech have been the appointed Secretariat, Publication Co-ordinator and Web Manager for the fixed line CPI initiative. Our position has given us a unique opportunity to experience the operation of a co-regulatory initiative from an independent and impartial standpoint. We therefore believe we are qualified to give an unbiased opinion of the successes and failures of this initiative and provide valuable insight for any future schemes.

We believe that UniTech have filled a vital role in keeping the present CPI process running smoothly. Whilst progress and changes have been hampered by the governance rules within the Forum, UniTech have nevertheless been able to drive improvements forward using the latest technologies available. A Forum such as this benefit greatly from independent 3<sup>rd</sup> party management who can act as a single focus for the initiative and pro-actively ensure progress is made.

Our response to the consultation is presented below as structured answers to the questions given within the consultation document. Our responses relate only to the fixed-line CPI initiative.

**2. RESPONSES TO QUESTIONS**

*1. Do you believe the current voluntary membership of both CPI schemes sufficiently captures the providers of these services?*

No.

In our capacity as the national focus for all feedback and enquiries related to fixed CPI, we have received comments from consumers by telephone, fax and e-mail regarding the lack of participation in the process. From our experience the majority of consumers do not know (or care) that this is a voluntary scheme, they simply want to know why company X is not participating and where can they find information about company X. Very often this relates to indirect operators providing low-cost alternatives. Consumers are wary of signing up for what looks like a much cheaper option as they are convinced the QoS will be very low.

*2. Do you believe consumers may be able to make adequately informed decisions based on alternative information that is already available?*

No.

We are not aware of any other source of comparable quality of service information. We are aware however of some sources of price comparison information.

*3. Do you believe that the costs to operators of supplying comparable information clearly outweigh the benefits?*

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We believe there are savings to be made in the current scheme and that there are few benefits as it currently stands. However, operators would gain much more if they were to actively market their results. We believe there are a number of reasons why operators do not promote the CPI results as much as they might:

- Lack of participant companies
- A historic ‘gentleman’s agreement’ made within the forum not to use the results for marketing
- Services covered by CPI are not the services people are buying.

It should be noted that this is an initiative intended to benefit the consumer, not the operator – but with a wider participation and a meaningful product, both consumers and operators would benefit. If awareness of QoS results were to become more prominent, operators would strive to achieve the best results, and the consumers would win from this.

*4. Do you believe that the inability to accurately quantify the benefits of providing comparable information puts in doubt the justification for a regulatory reporting requirement?*

We believe the benefits of an improved reporting process would be much clearer to identify than those of the current scheme. Increased consumer awareness and wider participation can only serve to increase competition and promote higher quality service delivery.

*5. Do you believe that the co-regulatory groups have largely failed to deliver adequate information to consumers?*

No. We believe the information is adequate, but it is not as comprehensive as it could be due to lack of participation and missing data.

*6. If so, do you believe they are capable of rectifying this situation without further regulatory involvement?*

We believe more regulatory involvement is the key to rectifying the situation. Operators must be mandated to participate and produce complete information.

*7. Do you agree that in order for consumers to make rational, well-informed decisions, they require comprehensive, accessible and comparable information?*

Yes

*8. Do you believe a co-regulatory structure is capable of providing the information needed to protect consumers?*

Only if that structure involves all major suppliers of the service and if the data produced is complete.

*9. Do you believe there is a different regulatory option that is not captured in this document?*

No.

*10. If so, what might another viable option entail?*

N/A

*11. Do you believe that there should only be a requirement to supply QoS information by those designated as universal service providers (ie. BT, Kingston)?*

No, consumers probably know more about these companies than others. In our experience consumers wish to compare the USP's with other less well known operators.

*12. Do you generally agree with the advantages and disadvantages listed against each option?*

Yes

*13. Do you believe that all providers of communication services should be required to provide comparable QoS information for consumers?*

We agree that the cost burden of producing this information may be too much for smaller companies and therefore reporting thresholds should be set.

*14. Do you agree with the criteria for testing consumer need and will this provide sufficient justification for either discarding or adding service measurements?*

We agree that regular research into consumer need is required to provide the justification for included measurements.

*15. Do you believe there should be a single source of consumer information for all communication services?*

We acknowledge that combining all the information into one publication would be difficult. A dedicated portal may be the best approach, from which all the sources of information would be accessible. UniTech have extensive experience in developing sensible, user-friendly portals and would be interested in discussing the possible solutions with Ofcom.

*16. Do you believe that one group or body should be responsible for collecting all communication services' QoS information?*

This approach would ensure the most consistency across the information provided – the end result being a better consumer experience as many companies are taking a few communication services and providing them as a single package. As mentioned above, the delivery of information may be best provided by a single web-based portal.

*17. What do you believe to be an adequate interval for providing QoS information (i.e. Every six months)?*

We believe the current 6-monthly interval is a reasonable one.

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### **3. CLOSING STATEMENTS**

From the options presented, UniTech would favour option 3 with the caveat that there should be a single spokesperson for the body that can make key decisions, sign contracts and approve expenditure. This is one of the major sticking points of the current co-regulatory initiative.

Failing this, UniTech would favour option 4.

UniTech are eager to continue their involvement with quality of service reporting. We are a dynamic and proactive company, and have much to offer in terms of management and technology solutions. Together with our extensive knowledge and background in the CPI process we have become a valuable commodity in this area and would welcome the opportunity to discuss future solutions with Ofcom.

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**4. CONTACT DETAILS**

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