

12 June 2025

Dear all,

## Metering and billing accuracy – call duration and other event measurements

This is an open letter to communications providers that are required by Ofcom's General Conditions (GCs)<sup>1</sup> to have their Total Metering and Billing System approved by a Metering and Billing Approval Body (TUV SUD, BSI and Enigma) ('the Approval Bodies') and comply with the Metering and Billing Direction.<sup>2</sup> It will also be relevant to some communications providers not yet subject to these requirements.

Last year, we sought to understand how changing technologies might affect the accuracy of call duration measurement and held several discussions with the Approval Bodies. Following this engagement, we are writing to request that you ensure that call duration and other event measurements<sup>3</sup> are treated as areas of focus when testing new technologies and equipment.

## Carrying out testing to adapt to new technologies

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Under the Metering and Billing Direction, event duration must be measured to within  $\pm 1$  second or  $\pm 0.01\%$  (whichever is less stringent).<sup>4</sup>

The technologies used to deliver communication services continue to evolve, for example with the PSTN-switch off in fixed-line and the migration to VoIP. In response to these and other technological changes, communications providers will continue to develop and roll out new equipment (including at a network level) and customer devices. As this occurs, there is the potential for services to perform differently, including in how call duration and other events are measured. In this context, it is important that the customer's experience when using their service (e.g. making a call) aligns with network measurement of that use.

It is increasingly important for communications providers to complete regular testing of new equipment and devices to ensure that call duration and other events continue to be measured within the standards required by the Metering and Billing Direction. It is similarly important for communications providers to ensure they are appropriately monitoring the accuracy of existing equipment and devices that customers are already using. We therefore request that, to the extent it

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<sup>1</sup> See GCs C3.4 and C3.5: Ofcom, [General Conditions of Entitlement: Unofficial Consolidated Version \(17 January 2025\)](#).

<sup>2</sup> Ofcom, [Metering and Billing Direction: Unofficial Consolidated Version](#) ('Metering and Billing Direction').

<sup>3</sup> Communications providers should refer to the definition of 'Event' on page 23 of the [Metering and Billing Direction](#). We expect communications providers to focus on the accuracy of all measurement capabilities (set out in Annex 2, Clause 3 and Annex 3, Clause 5) and the performance measurement requirements (Annex 2, paragraph 4.1) of the [Metering and Billing Direction](#).

<sup>4</sup> Clause 3.3 of Annex 2 (Retail Services) and Clause 5.1 of Annex 3 (Wholesale Services), [Metering and Billing Direction](#).

is not already, the testing of call duration and other event measurements are treated as areas of focus when changes are going to be made, and new equipment is to be introduced.

Please note, we have asked the Metering and Billing Approval Bodies to make call duration and other event measurement accuracy an area of focus over the coming year. This includes ensuring that communications providers:

- i) employ and document processes for error handling and End-User complaints related to billing; and
- ii) have in place and enforce effective procedures and/or documentation relating to third parties and sub-contractors where they are used. <sup>5</sup>

Your Approval Body may engage with you further on these topics. If you have any questions, please raise with your Approval Body.

Yours sincerely,

Consumer Protection Monitoring and Compliance Team, Ofcom

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<sup>5</sup> [Metering and Billing Direction](#), paragraphs 4.9.1 and 4.5.