

Consultation response form

Question	Your response
<p>Question 1: Do you agree with the conclusion in our Equality Act impact assessments</p>	<p>Confidential? – N</p> <p>Yes – Tesco Mobile agrees with the conclusion of the Equality Act impact assessment.</p>
<p>Question 2: Do you agree with our assessment of the potential impact of our proposal on the Welsh language? Do you think our proposal could be formulated or revised to ensure, or increase, positive effects, or reduce / eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</p>	<p>Confidential? – N</p> <p>Yes - TM agrees with the impact assessment carried out in relation to the Welsh language. We do not feel any further action is required.</p>
<p>Question 3: Do you agree with our assessment of the consumer harm arising from inflation-linked price variation terms?</p> <p>We invite evidence from respondents on the matters addressed in section three.</p>	<p>Confidential? – N</p> <p>We understand that the assessment was necessary given the 800 customer complaints that were made to yourselves. We acknowledge that it may lead to consumer harm particularly vulnerable customers including those that are struggling financially and/or have a disability and may find it hard to understand how Inflation Linked Price variation terms apply.</p> <p>It should however be noted, that 2023 was the first year that TM has implemented inflation related price increases but only where customers were out of contract and who decided not to upgrade. [Please refer to our response provided in relation to the ‘review of inflation linked in contract price rises’ information request from June 2023.]</p>

Question	Your response
	<p>TM worked very hard to ensure that customers were provided with FAQ help pages, CPI calculator page, Information and appropriate worked example.</p> <p>2024 will be the first time we apply inflation related in contract price rises. This year we have made improvements to provide transparency to our customers by providing “from and to” prices within customer notifications.</p>
<p>Question 4: Do you agree with the conclusion in our impact assessment?</p>	<p>Confidential? – N</p> <p>We agree that providing upfront information in pounds and pence will provide customer clarity in relation to price increases.</p>
<p>Question 5: Do you agree with our proposal to require providers to ensure that the following information is drawn prominently to the customer's attention in a clear and comprehensible manner before a customer is bound by a contract: i) the Core Subscription Price; ii) if the Core Subscription Price is to change during the Commitment Period, that changed Core Subscription Price, in pounds and pence; and iii) the date from which any changed Core Subscription Price shall have effect?</p>	<p>Confidential? – N</p> <p>Yes- TM agrees with your proposal that the 3 points (as set out in i-iii) should prominently be drawn to the customers attention in a clear and comprehensible manner. We agree that particular attention will also need to be made during sales calls and other face to face verbal sales.</p>
<p>Question 6: Do you agree with our proposal to require providers to include in the Contract Summary: i) the Core Subscription Price; ii) if the Core Subscription Price is to change during the Commitment Period, that changed Core Subscription Price in pounds and pence; and iii) the date from which any changed Core Subscription Price during the Commitment Period shall have effect?</p>	<p>Confidential? – N</p> <p>Yes – TM agrees with this proposal.</p>

Question	Your response
<p>Question 7: Do you agree with our proposal to require providers to include in the Contract Information: i) if the Core Subscription Price is to change during the Commitment Period, that changed Core Subscription Price in pounds and pence, and ii) the date from which any changed Core Subscription Price during the Commitment Period shall have effect?</p>	<p>Confidential? – N</p> <p>Yes – TM agrees with this proposal.</p>
<p>Question 8: Do you agree with our proposed additions and amendments to GC C1 (see detailed amendments in annex 5)?</p>	<p>Confidential? – N</p> <p>Yes – TM agrees with this proposal.</p>
<p>Question 9: Do you agree with our proposed additions and amendments to existing GC C1 guidance to clarify our expectations on how providers could comply with the new requirements (see detailed amendments in annex 6)?</p>	<p>Confidential? – N</p> <p>Yes – TM agrees with this proposal.</p>
<p>Question 10: Do you agree with the proposed implementation period of four months from publication of the statement and the changes to GC C1 and guidance?</p>	<p>Confidential? – N</p> <p>Whilst supportive of Ofcom’s proposal to include more detail in customer communications, we feel that 4 months is not a sufficient time period for Tesco Mobile to safely implement the changes.</p>

Please complete this form in full and return to cameron.bailey@ofcom.org.uk.