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FAO: Catherine Galvin Floor 4 Competition Group

2A Southwark Bridge Road

London SE1 9HA

25 September 2009

Dear Ms Galvin:

Re. NTS Retail Uplift charge control and PRS bad debt surcharge

I write in reference to the proposed increase of Bad Debt surcharge from 3.03% to 9.7%. I believe this is entirely unjustifiable and the proposition stands on very weak foundations.

It appears that 3.03% is already an inflated charge and so to increase this rate to 9.7% is far from reasonable. I would propose that the current rate of 3.03% is held until Ofcom have had the opportunity to fully assess this further, including addressing the following areas:

- What statistical data the current 3.03% rate is based on.
- What is currently being considered as bad debt.
- What implications would this have on the PRS industry.

In addition, I feel that movements towards monthly billing by BT be considered as I believe this one change would considerably change the outlook on current bad debt figures.

Please don't hesitate to contact me if I can be of any assistance at all in reference to the above.

Yours sincerely,

Jordon Lau

InverOak Limited