



## Metering and Billing Approval Bodies' Forum

### “Open” Meeting

**Date:** Thursday 12<sup>th</sup> November 2015 – 10.00hrs – 12.30hrs

**Location:** OFCOM

### NOTES

Meeting began with Stephen Green of Ofcom giving an update of the progress for the TMBS Approval Logo. Stephen suggested there was “broad support” from the industry and 11 responses had been received by Ofcom. Consultation link here [http://stakeholders.ofcom.org.uk/binaries/consultations/metering-billing-logo/summary/Metering and Billing Approval Logo.pdf](http://stakeholders.ofcom.org.uk/binaries/consultations/metering-billing-logo/summary/Metering_and_Billing_Approval_Logo.pdf)

Non Confidential responses can be seen on the Ofcom website - link here:

<http://stakeholders.ofcom.org.uk/consultations/metering-billing-logo/?showResponses=true>

Ofcom is in the process of considering responses and a decision will be made based on the consideration. Decision to be finalised around Q4 2015. This does not prevent existing Approved CP's from using their own ABs' logos and Kitemarks.

There was a question from BT around size of business joining the Approval process and whether it was a question of education of CP's as to who can and cannot join, the answer was that any CP can join, regardless of size. It was admitted that the Direction was not clear on this due to a £5m threshold being documented, the history of which was uncertain. However, in their mutual roles, ABs and Ofcom can and should clarify when required. Paul Lewis of TUV SÜD BABT confirmed that no CP would be refused from joining the Scheme.

The question of Data Services arose from BT, PECS verses PATS. The consensus was that if the services could not be split out for reporting and auditing purposes that they be reported as combined services as it would be better to see the whole picture related to performance rather than a smaller view if the services were apportioned.

Stephen Green of Ofcom said that it would be necessary to have a review of the Direction to ensure it was fit for purpose as Ofcom does acknowledge that data services are increasing.

Vodafone Mobile raised the issue that trying to implement Metering & Billing rules in a business where data is predominant and voice diminishing was instrumental in undermining the authority of an OBAPM. Stephen Green of Ofcom did mention that where possible Ofcom split out the complaints into the separate services with relevant categorisation, Ofcom is currently reviewing its Complaints gathering procedure to ensure that it captures both voice and data complaints sufficiently to give a view of the quality of data being gathered for each of the services.

**CP 2 Question** - The above prematurely answered the question asked by CP 2 related to converged billing and what the AB view was on managing measurement under the direction when voice is mandatory but non mandatory services are more prevalent.

CP Questions prior to meeting – See Agenda below at end of Notes, for detail of questions.



**CP1 Discussion Point** - Paul Brook of Telecom Plus gave an insight of his experience of implementing the Telecom Plus TMBS. His negative experiences came from the amount of work it took to convince the business to spend time documenting, reporting and reviewing performance on voice products when the business model included much more than just voice and included utilities such as gas and electricity.

However, Paul did say that the ethos of the Metering & Billing Direction rules helped the business to better review quality of performance in a number of areas/functions that had previously been invisible to management. This gained the support of senior management, it was then easier to implement best practice and improve performance.

Paul did suggest that the Direction would need to be broadened to include all services, if it were to be continued at all.

Paul also asked the question of whether the Direction was at all relevant in the current market of much competition. There was discussion around the fact that if the Direction did not exist the requirements for General Conditions would still have to be fulfilled and maintained. However, the Metering & Billing Direction is actively and externally audited whereas the GC rules are not.

**CP 3 Question** of how best practice and level playing field issues can be shared by possibly making guidelines available to CPs– Mike Inman of BSI discussed ISO 9001 and the Clause in the Direction (4.5) that requires the ethos of ISO 9001 to be used when reviewing CP documentation and TMBS even if there is no formal ISO certification in place.

Paul Brook of Telecom Plus made the point that ISO did actually give guidelines.

Carla DeFreitas of Three also raised her issue (**CP 4 Question**) that there was insufficient guidance and templates / guidelines would be helpful, despite the disparate nature of CPs. The discussion revolved around the subject and included the CPs being informed that UKAS as the body that accredits all the Approval Bodies, including undertaking witness audits, any level playing field issues that arose regarding Approval Bodies treating any issues differently would be highlighted and addressed.

Following further discussion around the point of CPs being very disparate in nature with comparisons being made between a mobile CP (MNO) owning its own end to end network and providing services on the back of it versus an Mobile Virtual Network Operator (MVNO) which owned none of its infrastructure and relied on third parties for virtually all service provision – and how difficult guidance would be to consolidate that would not encourage some CPs to use it verbatim.

The point was also made that Process documentation / Appraisals were a necessary part of a TMBS in explaining how the functions worked individually and how they also worked together to provide a service. The OBAPM alone cannot own the whole TMBS and needed to elicit the support of all function owners to get the necessary documentation written in a format sufficient for AB understanding and TMBS audit. In cases where the OBAPM did try to own the entire TMBS the HLD was disproportionately long and cumbersome because it tried to incorporate all aspects of the TMBS when the documents owned by the relevant functions should really be referred to and cross referenced to a common location.

At the end of the discussion, **Paul Lewis of TÜV SÜD BABT took away an Action Point** for the ABs to document a consolidated approach for implementing a generic TMBS along with Frequently Asked Questions (FAQs).

The subject of Convergence again arose and AB Ray Murphy of Enigma QPM made the point that the TMBS should include all aspects of the CP product if they could not easily be separated rather than try to exclude any aspect through apportionment of services. This would give a better opportunity to identify risks and address issues across the board.

Michele Gibson of TÜV SÜD BABT made the point that a good TMBS includes proactive evaluation of points at all functional interactions whether internal or third party. This prevents any issues from taking the end to end journey only to be highlighted in Customer Complaints or Customer Dissatisfaction which is purely re-active and not good for business.



Paul Lewis of TÜV SÜD BABT reinforced the subject of a CP having quad play (say TV, Voice, Data, SMS etc) should include all data in metrics / trends so that a full picture of performance is visible and issues addressed across the board.

Derek Keeble of BT volunteered to consolidate any willing CP members into a Forum to provide templates for implementing a TMBS supported by the experiences of CPs who have already been through Approval. Approximately 15 CPs demonstrated that they would be willing to participate. Derek to send an email round to progress this Action.

Guy Elliot of TalkTalk asked the question of why the timescale for gaining Approval from the 2008 to the 2014 Direction was so short. The answer is that Ofcom set the timescale.

Mark Forson of Vodafone raised the question of how a successful TMBS could be consolidated and Approval gained in the light of major change / business disruption related to a merger (for example). The answer is that regardless of this issues that may “take the eye off the ball”, the customers still need to be billed accurately and a formal project plan should mitigate any impact to the quality of customer service. Paul Lewis made the point that some CPs hid behind the excuse of major change etc., but this did not diminish the need to maintain good customer service and gain Approval.

Stevan Boatswain-Smith of SSE asked how some CPs got ‘early’ approval but it was pointed out by Paul Lewis that it was the date of Application that dictated the timescale to meet Approval. Also, that some CPs who had not gained Approval to the 2008 Direction had 24 months to achieve Approval, whereas CPs who had Approval to the 2008 Direction were given less time by Ofcom because Approval was deemed to be an easier task.

Again the subject of the Metering & Billing logo was discussed, Paul Lewis stated that the logo may or may not be implemented, if it was, the ABs have agreed to police the implementation of the Logo to ensure that only those relevant Services Approved are advertised as being linked to the Logo.

Paul Lewis tried to elicit any further questions, there were none. The next Open MABABF was set for approximately 6 months from today’s date 12/11/2015.

**Meeting Closed and Lunch was served.**

**Below is the Meeting Agenda for information and for those who could not attend.**



## **Metering and Billing Approval Bodies' Forum "Open" Meeting**

**Date: Thursday 12<sup>th</sup> November 2015 – 10.00hrs – 12.30hrs**

**Location:** OFCOM  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

**Directions:-** (Click on streetmap link below):-

<http://www.streetmap.co.uk/map.srf?x=532284&y=180497&z=0&sv=SE1+9HA&st=2&pc=SE1+9HA&mapp=map.srf&searchp=ids.srf>

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**Enquiries:-** Ofcom Switchboard: 0300 123 3000

### **AGENDA**

**10.00 - 10.30** Arrival – Tea / Coffee

**10.30 - 10.35** Welcome and Introduction

**10.35 – 10.45 Ofcom update on TMBS Approval Logo Scheme**

**10.45 - onwards**

- 1. AB feedback on Issues Log and resulting Level Playing Field Points discussed and agreed**
- 2. General Client discussion points on implementing the Direction – from specific client points raised.**
  - a) Sharing best practice and promoting a level playing field in implementing the M&B Direction 2014.
  - b) Managing measurement under the Direction
  - c) Documentation to assist Approval

**12.00 AOB**

**Meeting Closed**



**The below are the specific client points raised for discussion.**

**CP 1:**-Will share experiences in implementing the M&B Direction 2014.

**CP 2:**-I would like to understand the approval bodies view of managing measurement under the direction, in an environment / market that we are seeing moving more and more to non-differentiated converged billing, (bundled / managed services etc.) and more importantly where the direction is voluntary / excludes some aspects (Data / Content).

**CP 3** – we are well aware of difficulties caused by competition law but are Ofcom's / AB's aware of any way that CPs can share best practice in a way that does not compromise competition law but still facilitates the implementation of a compliant TMBS that promotes a Level Playing Field.

**CP 4** - It would be useful if Ofcom produced supporting templates, examples of documentation and suggested blueprints to help CPs achieve approval. After spending a considerable amount of time putting together Three's MSD, based on our interpretation of the Direction, it then required re-work after you made clear what format and style it should take. An example would have been extremely helpful and not delayed my timelines.