



## Objection to the Granting of Approval to the Ofcom Metering and Billing Direction

British Telecommunications PLC – Openreach TMBS – Wholesale Services to CPs for LLU (MPF) and WLR3 Service Provision - MET3029

On 15 June 2015 TÜV SÜD BABT received an objection to the granting of Metering and Billing approval from the Post Office Ltd.

The objection stated:

Post office challenges this notification. TMBS approval exists to protect Consumers from inaccurate billing. By allowing this approval BABT will be condoning a billing policy that causes tremendous distress to Consumers, requires all CPS to continue to dedicate resource to remedy the inaccuracies and is a major source of complaints to Ofcom and the Ombudsman services.

Post Office can provide evidence to Ofcom demonstrating that:

In excess of 20% of all TRC charges are wrong.

Openreach over and undercharge on recurring line rentals

Openreach late bill, counter to TMBS rules, issuing charges that are over 3 months old and therefore we are not always able to bill on. Further when Customer's dispute due to the age of the charge Openreach systems may no longer hold the necessary information to assess the dispute.

Further, we fail to understand how the approval can be granted with an AVC exception, Post Office is aware of incidents where these charges have been levied and yet we are able to demonstrate that the Engineer never attended site.

Granting approval to Openreach without addressing well documented underlying inaccuracies will undermine the TMBS process and fundamentally fail Consumers.

TÜV SÜD BABT assessed the basis for the objection from the Post Office. The scope of the approval to be granted to Openreach was for the metering of wholesale services only and as such any charges (AVCs and TRCs) and inter operator billing is out of scope of the approval. The scope of the approval is clear on the notification and certification documents.

TÜV SÜD BABT requested the Post Office Ltd to provide evidence to support their objection and was given a deadline of the 15 July 2015 to provide this evidence. No evidence was forthcoming at that time or since.

The objection was not upheld and approval was granted.