

Subject: Switching in telecommunications sector: Draft best practices from the EU regulators (BEREC) - Comments from The Danish Consumer Council

Switching in telecommunications sector: Draft best practices from the EU regulators (BEREC)

The Danish Consumer Council supports the submission by BEUC, and would like to add the following comments:

Question 1:

Switching times between telecom operators in all four categories in Denmark are made too long by the general use of the maximum binding period of “end of month + 30 days” after a switch has been requested by the consumer. Since this practice is generalized, a general agreement between operators to shorten this period (which has little or no technical basis in most cases) will hurt no operator. To shorten the period will serve to make competition more effective by reducing response times to changes in the markets and it will increase consumer satisfaction. Alternatively, special legislation forcing the length of the period down may be considered.

Question 6:

Best Practice Principle 2:

Comment:

The consumer should receive written confirmation – by letter, or if agreed, by mail – of the order to make a switch. This will make it possible for the consumer to object to a wrongful switch and serve as future documentation.

Best Practice Principle 3:

Comment:

The consumer should have a running update (by e-mail or a specific web-page) on the progress of the switching process. This will increase the consumer’s confidence in the proceedings and allow her to intervene, if a mistake is being made.

Question 7:

Any other Best Practice Principles:

Lack of transparency with regard to prices, service characteristics and conditions is an important obstacle for consumers to join the switching process, as well as making correct choices for their own particular usage patterns.

It should therefore be established as a best practice principle that the Regulator provides an objective, internet-based comparison tool for consumers to compare offers in terms of both price and quality of service. The “Teleguide” established by the Danish regulator is a prime example of how it can be done authoritatively, effectively and at little cost (<http://www.it-borger.dk/verktojer/teleguide>).