



BT response to ICSTIS' consultation on enhancing stakeholder engagement

Please address any queries on this response to:
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Introduction

BT is pleased to see that ICSTIS recognise the need to professional some of their existing processes. This will have several benefits including improved transparency and resource allocation. BT's answers to the ICSTIS' questions follow on the next pages.

Response to Questions

Q1. Do you agree with the responsibilities we have outlined above? If not, why not?

BT agrees with the responsibilities outlined, especially as it is vital to improve consumer confidence in premium rate services (PRS). This seems a sensible mix of consumer and industry focus.

Q2. Do you agree that all stakeholders require these things from ICSTIS. Are there other requirements which are generic to stakeholders?

BT agrees that all stakeholders require ICSTIS to have clarity of purpose, be responsiveness to needs, be impartial and apply the principles of good regulation.

Q3. Do you agree with our assessment of the needs and the specific stakeholder groups identified above? If not, where do you disagree and why?

BT agrees with the specific needs outlined for consumers and those that represent them. Telephone companies also have a part to play and are obliged under General Condition 14 of the Communications Act to provide similar information via a free customer code of practice. BT's own information is covered in the BT Consumer and Small Business Code of Practice.

BT agrees with the specific needs outlined for government and other regulators. In addition, BT is pleased that ICSTIS has highlighted the need to work with other regulatory bodies to ensure that, where regulatory overlaps occur these are understood and issues are minimised, as this is essential going forward.

BT agrees with the specific needs identified for industry, particularly the focus on value for money and PR. BT believes it is essential that ICSTIS work with groups such as the Industry Liaison Panel to develop a true co-regulatory environment that benefits all parties. In addition, it would be helpful if ICSTIS can make the purpose clear in each piece of communications with industry to avoid any confusion.

BT agrees with the specifics detailed for legislators/parliamentarians.

BT agrees with the needs detailed for the media. BT suggests that it could be beneficial for ICSTIS to develop some positive stories, to use when appropriate, as the media can sometimes take things out of context. Thinking of recent press speculation concerning adjudications it is important that ICSTIS' deliberations are kept confidential until all the involved parties have been informed.

BT agrees with the needs outlined for Ofcom. BT suggests that the MoU needs to be reviewed as it hasn't changed since it was first issued in August 2005. The review should ensure it is clear where the ICSTIS remit begins and ends, for example in relation to participation TV.

Q4. How could we improve our engagement through the ICSTIS website?

BT suggests that the website number checker could be improved so that the information includes details of both the service provider and the service provided, as it is normally the latter that satisfies the customer's query.

Q5. Are there any stakeholder expectations that we may have overlooked?

BT agrees with the stakeholder expectations outlined.

BT suggests that an additional piece is needed in terms of ongoing education for the government, other regulators, legislators and parliamentarians to keep their knowledge up to date as this could be very helpful, for example this pre-work could have paid dividends during the recent participation TV inquiries.

In terms of the industry stakeholder group ICSTIS may like to consider promoting the service they offer for companies assessing new products/services and how they might be viewed under the Code as BT has personally found this service valuable.

Q6. Are there other measures that would contribute to benchmarking our success in improving stakeholder engagement?

BT agrees with the suggestions outlined.

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