

BT Comments on the ERG Proposed Mobile Roaming Guidelines

BT is concerned that the ERG has not acknowledged the existence of the reseller/MVNO market and in particular the restricted abilities that resellers have in meeting the requirements. Whilst the ERG can't re-invent the Regulation BT believes there ought to be some comment or acknowledgement in the guidelines, for the benefit of enforcing NRAs and in-country resellers, that the Regulation ignores an entire section of the market and a distinct supply chain.

For the data alerts BT believes that receipt of a warning message for voice SMS, MMS and data at the point of entering the member state really ought to be sufficient without the need for secondary messages at the point of connecting a data device.

BT believes that if a customer already has a data usage limit as part of their contract, whilst they should be given the option to change to the 50 Euro limit, by default it will not be applied to them as they are already in a state of "usage awareness" having set a limit with their existing contract.

Specific warning trigger points for data, such as 80% of usage, should be avoided; the mobile CPs should have freedom to set their own point of notification given any technical limitations of their systems. The ERG guidance should simply state that warning is to be given such that the user can react and make a decision in good time.

CPs should be able to devise their own method of managing the cut-off when a financial or data limit is reached within broad principles and taking into account customer experience. The warning should be readily accessible to the customer and they should be given ample time to react, but in no circumstances should a non-pre-pay customer be cut-off mid-session. They should be given an opportunity of a "click to continue or save now" type message. Expecting CPs to devise methods of retaining "lost" data etc. is not realistic.

The interpretation that "month" can be billing cycle month not just calendar month is useful.