

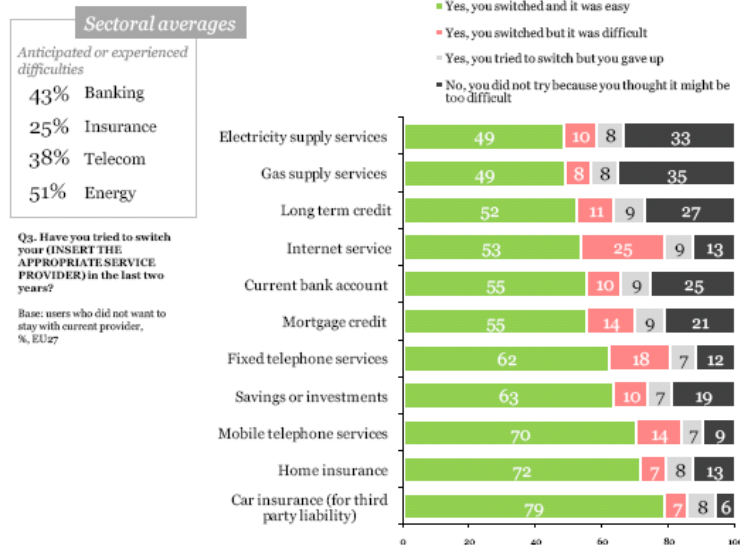


BEREC REPORT ON BEST PRACTICES TO FACILITATE SWITCHING Vodafone comments

Vodafone welcomes BERECs draft report on best practices to facilitate switching in communications markets. We have a few brief points to make.

First, Eurobarometer data confirm that switching amongst mobile providers is significantly easier than amongst fixed or broadband providers and compares well with switching in any other sector the European economy.

Ease of switching



The BEREC presentation of these results (Figure 14 of the draft report) mislabels the fixed and mobile results to suggest that mobile performs less well than fixed. This needs to be corrected.

Second, the new European regulatory framework includes a number of measures which should further improve switching once implemented. The BEREC report suggests that chief obstacles to switching mobile provider are contractual obligations

and lack of consumer information. These are addressed by additional requirements regarding maximum contract durations for consumers and provisions allowing for the introduction of additional tools to increase the transparency and comparability of consumer offers. Vodafone believes that a key area of focus for the industry and for BEREC in the near future should be transparency of customer information in relation to the provision of broadband services.

The report also helpfully confirms our long held view that the actual time taken to switch is not generally seen as important: what matters is that it occurs when the customers expects it to. Further changes to switching and number porting processes to reduce headline switching times should be approached sceptically.

Finally, the report rightly notes the need to balance the trade-offs between the various best practices and that a zero switching cost is not necessarily the appropriate or proportionate objective. BEREC may need to think further on what 'proportionality' means in this context in the coming years.