



Preliminary Consultation

Electronic, and other, itemised bill formats

Minimum requirements for itemised bills for electronic communications services

Document No:	10/96
Date:	1st December 2010

All responses to this preliminary consultation should be clearly marked:-

“Reference: Submission re ComReg 10/96” as indicated above, and sent by post, facsimile, or e-mail, to arrive on or before 1pm on Thursday 13th January 2011 to:

Ms Michelle O’Donnell
Commission for Communications Regulation
Irish Life Centre
Abbey Street
Freepost
Dublin 1
Ireland

Ph: +353-1-8049600 **Fax: +353-1-804-9680**
Email: retailconsult@comreg.ie

Please note that ComReg will publish all inputs, subject to the provisions of ComReg’s Guidelines on the Treatment of Confidential Information – ComReg 05/24.

This preliminary consultation is not a binding legal document and also does not contain legal, commercial, financial, technical or other advice. The Commission for Communications Regulation is not bound by it, nor does it necessarily set out the Commission’s final or definitive position on particular matters. To the extent that there might be any inconsistency between the contents of this document and the due exercise by it of its functions and powers, and the carrying out by it of its duties and the achievement of relevant objectives under law, such contents are without prejudice to the legal position of the Commission for Communications Regulation. Inappropriate reliance ought not therefore to be placed on the contents of this document.

Contents

Foreword	2
1 Introduction	3
2 General Principles	5
2.1 AVAILABILITY AND TRANSPARENCY OF DETAILS OF THE E-BILLING SERVICE OFFERED	5
2.2 THE PERMISSIBLE DEFAULT FORMAT OF ITEMISED BILLS	6
2.2.1 <i>The nature of the service</i>	6
2.2.2 <i>The nature of the charges</i>	7
2.3 OTHER FORMATS OF ITEMISED BILLS	7
2.4 PROCESS TO CHANGE A CUSTOMER FROM A BILL FORMAT	8
2.4.1 <i>Obtaining the customer's agreement to change bill format</i>	8
2.4.2 <i>The method by which the customer interacts with his/her service provider</i> .	9
2.4.3 <i>Registering the customer's preference to 'opt-back' to the permissible default format</i>	9
2.4.4 <i>Customer 'inertia'</i>	9
2.5 CHARGING FOR ITEMISED BILLS AND APPLICATION OF DISCOUNTS FOR CERTAIN BILL FORMATS	10
2.6 BILL LAYOUT, CONTENT AND PRESENTATION	11
2.7 ALERTS TO SIGNAL E-BILL AVAILABILITY	12
2.8 BILLING FREQUENCY	13
2.9 BILLS FOR PRE-PAID SERVICES	13
2.10 'OTHER' CUSTOMER CORRESPONDENCE	14
3 Submitting Comments	15
Appendix A – Consultation Questions	16

Foreword

This preliminary consultation document is published by the Commission for Communications Regulation (“ComReg”) to seek the initial views of stakeholders on a range of issues related to the proposed principles, set out in this document, for the purpose of establishing the minimum requirements for itemised bills for electronic communications services.

ComReg is aware that many providers of electronic communications services have the facilities in place to offer billing by electronic means to their customers and, indeed, that a proportion of their customers are in a position to avail of, and to choose, electronic billing (e-billing) services. In this context, ComReg recognises the desire by providers of electronic communications services to move their customers to e-billing and understands the potential benefits accruing from increased take-up of e-billing (including cost and environmental benefits). ComReg also recognises that some consumers of electronic communications services wish to move to an e-bill.

ComReg understands the potential of an online platform to facilitate, with proper planning and communication, enhancing a consumer’s experience of interacting with their service provider. ComReg would note that, in most cases, where regulatory obligations with respect to e-billing apply, an electronic bill (e-bill) is permitted where explicit prior consumer consent is obtained. ComReg is of the view, however, that any move to e-billing should take full account of, and safeguard, the legitimate preferences and interests of consumers.

ComReg looks forward to receiving inputs from all stakeholders to enlighten its formal consultation, to be conducted in Q1 2011, with respect to its regulatory approach, in the context of an evolving regulatory framework and taking account of its statutory obligations in respect of all sectors within its regulatory remit. In the interim, ComReg is of the opinion that, in the interests of consumer protection, electronic communications providers should reflect on these proposals, prior to the development and implementation of e-billing initiatives.

It is requested that inputs to this preliminary consultation are received by 13th January 2011, and it should be noted that all inputs received will inform the formal consultation, and will not be responded to separately.

Mike Byrne
Commissioner
Commission for Communications Regulation

1 Introduction

This preliminary consultation document is published by the Commission for Communications Regulation (“ComReg”) to seek the initial views of stakeholders on a range of issues related to the proposed principles, set out in this document, for the purpose of establishing the minimum requirements for itemised bills for electronic communications services.

ComReg considers that itemised bills (both paper and electronic) are a basic consumer requirement that allows consumers to verify, and control, the charges incurred and to adequately monitor their usage and expenditure. ComReg is also cognisant of the provisions of Regulation 7 of the Data Protection and Privacy Regulations 2003¹, and in particular that consumers have the right to request and receive bills that are not itemised, if they so wish.

In recent months, some providers of electronic communication services have sought to move their customers to electronic, including on-line, bills using various mechanisms. ComReg, however, is mindful that some consumers of electronic communications services are not in a position to avail of, or use, e-billing and do not wish to move to this type of billing facility.

ComReg notes that, in most cases, where regulatory obligations with respect to e-billing apply, an e-bill is permitted where explicit prior consumer consent is obtained. ComReg presently has a range of mechanisms available to it, including consumer protection provisions that can be applied to the General Authorisation², if it were to seek to introduce specific obligations on providers of electronic communication services in respect of itemised bills, in order that obligations can be standardised across all providers of electronic communication services. ComReg also notes that Directive 2002/22/EC of the European Parliament was amended by Directive 2009/136/EC (“Amending Directive”). Articles 29(1) and 23a of this Directive provide scope, subject to transposition, for ComReg to prescribe the basic level of itemised bills to be provided by undertakings to subscribers and for ComReg to implement measures to ensure equal access and choice for people with disabilities.

ComReg has concerns that, in the absence of a standardised framework and specified obligations that are applicable across all providers of electronic communications services, various approaches will be adopted by providers and that consumers may not, therefore, be adequately protected. ComReg has previously engaged with industry, through the Telecommunications and Internet Federation (TIF), on this matter and notes TIF’s view that consumers should not be disadvantaged by a move to e-billing. ComReg would encourage TIF to mobilise its membership in this consultation process, in line with its stated objective of “*promoting policy recommendations reflecting the views of operators and users in relation to telecommunications and internet matters*”.

¹ Statutory Instruments S.I. No. 535 of 2003 European Communities (Electronic Communications Networks and Services) (Data Protection and Privacy) Regulations 2003

² Section 18, *Consumer Protection Rules*, of the General Authorisation “Conditions for the provision of Electronic Communications Networks and Services”, Document No, 03/81R2, revised 7 April 2010.

In the following Section, ComReg sets out its preliminary views on a range of issues related to this subject and would encourage all stakeholders, including industry, consumers, other regulatory bodies and the Revenue Commissioners, to respond.

2 General Principles

This Section sets out the general principles that ComReg considers would be important in relation to itemised billing and, in particular, the format of the bill, either paper or electronic. Such principles, if established, would ensure a consistent approach by service providers, and adequate protection for consumers.

2.1 Availability and transparency of details of the e-billing service offered

An e-bill is a bill that is made available to the customer via e-mail, or by signing-on to a system that is accessible via the internet (i.e. on-line). A bill provided by e-mail is, generally, conveyed by means of an accompanying document/file. The customer will need appropriate software to read the file. This method of e-billing allows the customer to print their bill at any time, to access their bill at any time, and to store their bill on their personal computer, or in print format.

An e-bill, depending on the service may offer access to historic bills, may allow the customer to ‘download’, or store, the bill in an electronic file, and may allow the customer to print their bill. An e-bill is, generally, provided via the service provider’s website and requires the customer to sign-in to that part of the website, using a specific Customer, or User, Identification Code and Password, or Pin Code.

Some consumers may equate moving to an e-bill with a requirement to pay their bill electronically. However, these two issues should remain separate, and the provision of an e-bill should not automatically mean a requirement for the customer to pay by particular methods (e.g. by credit/debit card or direct debit).

Given the methods and features of e-billing outlined above, it is reasonable to establish the principle that service providers should provide detailed information to assist consumers in making informed decisions regarding their bill format preference.

With respect to any e-billing service offered by service providers, information provided to consumers should include details of:

- The precise electronic means (online, via e-mail, etc) offered by your service provider.
- Whether the electronic means is available while in receipt of a paper bill.
- Whether previous bills are available on request in paper format and if there is a charge applied.
- The systems/software/facilities that are required to access the e-bill.
- The security features that are available to ensure that there is no unauthorised access to details of calling users and called subscribers.
- Whether the e-bill facility is accessible for consumers using screen-reader software.
- How to access the e-bill facility (procedures for registering, signing-in to the system, etc).

- If you can, and how to, “download” or store the e-bill on the individual’s personal computer.
- If you can, and how to, print the bill.
- The length of time the on-line system stores the bill; and
- Details of the payment methods available.

Q. 1. Do you agree with the principle that electronic communications service providers should provide detailed information, as outlined above, for consumers with respect to any e-billing service that they offer? If not, please provide reasons to support your view.

2.2 The permissible default format of itemised bills

ComReg is considering whether it is reasonable to establish the principle that, for each type of electronic communications service³, a permissible default format(s) of bill should be determined. This would mean that service providers would offer at least one of the permissible default format(s), established by ComReg, to their customers, as standard and free-of-charge. This proposed principle is based on the view that consumers should have similar expectations and protection with respect to itemised bills across the range of service providers for particular service-types. In considering the most appropriate permissible default format(s), ComReg would propose to take into account certain assumptions with respect to each customer’s preference for electronic, or paper, bills, given the prevailing circumstances.

In this context, it appears that the most relevant issues for consideration in setting the permissible default formats include the nature of the service and the nature of the charges incurred.

2.2.1 The nature of the service

ComReg is considering whether, for certain services, service providers can assume that the customer has access to, and uses, the internet and that, therefore, subscribers to that service can access, and probably wish to use, an e-billing service. It may, therefore, be reasonable to allow the service provider to establish its default format for a broadband, or bundled, service to an e-bill. On the other hand, ComReg is considering whether, for a voice-only service, it is not reasonable to assume that all subscribers to that service have access to, or use, the internet and that, therefore, the service provider should *not* set an e-bill as its default format.

An additional consideration for mobile phone users is that, although they may use the internet from their handset, it may not be an acceptable method for accessing their bill, due to handset display constraints and limited ability to print a bill, should they wish to do so.

³ E.g. Fixed Voice, Mobile Voice, VOIP, Internet, Voice and Internet.

2.2.2 The nature of the charges

The primary purpose of a bill is to allow consumers to verify and control the charges incurred and to adequately monitor their usage and expenditure. ComReg is considering whether, for certain services (in particular, ones including broadband) where the charge is a recurring subscription charge only, an e-bill may be an appropriate default format.

However, ComReg is also considering whether, for certain services, where the charges are determined by the customer's usage, (which might be in addition to a recurring subscription or other charge), it may be more complex for the customer to review their charges using an e-bill. In this case, a paper bill may be the most appropriate format to allow the customer to analyse their bill.

Q. 2. Do you agree with the principle that ComReg should establish a permissible default bill format(s) for each service, taking into account the nature of the service and the nature of the charges? If not, please provide reasons to support your view.

2.3 Other formats of itemised bills

ComReg is of the preliminary view that providers of electronic communications services should offer an alternative format to the permissible default format(s), as determined by ComReg, free-of-charge to a particular customer with a disability, if the permissible default format(s) is not accessible by that customer. For example, a person with a vision impairment may not be able to read a paper bill, or access the provider's online service, due to the use of CAPTCHA⁴ (security software) or due to the fact that the operator's website, where the e-bill is accessed, does not facilitate the use of screen-reader software. In this instance, the customer may be able to access a text document, another electronic file or other method to access their bill.

ComReg also considers that, should it determine, for a particular type of service that the only permissible default bill format is a paper bill, electronic communications service providers and consumers may mutually benefit from an e-bill, or other formats. In this case, ComReg is of the preliminary view that the customer must explicitly agree, or opt-in to, moving to a particular bill format, including an e-bill, from the permissible default format, as outlined in section 2.4.

⁴ Completely Automated Public Turing test to tell Computers and Humans Apart.

- Q. 3. Do you agree with the principle that providers of electronic communications services should offer an alternative bill format, free-of-charge, to a particular customer with a disability, if the default permissible format(s) is not accessible by that customer? If not, please provide reasons to support your view.**
- Q. 4. Do you agree with the principle that the customer must explicitly agree, or opt-in, to moving to a particular bill format, including an e-bill, other than the permissible default format? If not, please provide reasons to support your view.**

2.4 Process to change a customer from a bill format

When a customer signs-up to, or is an existing customer of, an electronic communications service, he/she should be set-up by the service provider with one of the permissible default bill format(s) for that service. The customer should be able to choose, if he/she so wishes, to move to another available bill format, rather than the service provider making that choice for the consumer.

2.4.1 Obtaining the customer's agreement to change bill format

Many consumers have chosen to move to e-billing by contacting their service provider and explicitly opting-in to e-billing. ComReg welcomes the introduction of facilities that allow consumers to exercise their choices.

ComReg suggests that the service provider may, and should, by using written or electronic means, request the customer's positive agreement/consent to move to a bill format, including an e-bill, other than the permissible default that he/she has been set up with. However, if the customer does not agree, or does not respond, then agreement/consent has *not* been obtained: the customer should not be moved to an e-bill and the service provider should wait for a reasonable period, to avoid putting undue pressure on the customer, before seeking the customer's agreement again.

ComReg recognises that service providers may wish to use electronic means, such as a phone call (including Interactive Voice Response (IVR)), e-mail or text message, to ask the customer if he/she would like to move to e-billing and to register the customer's explicit agreement. ComReg would regard such arrangements as acceptable, provided that customer agreement is recorded by the service provider, and fully auditable.

2.4.2 The method by which the customer interacts with his/her service provider

Many consumers are using the on-line services made available by their service provider. However, they may not have chosen to move to an e-bill instead of a paper bill. Additionally, some consumers may already interact by e-mail with their service provider.

Depending on the nature of the e-bill and the method of customer's previous interactions with the service provider, ComReg is considering if there are any circumstances where, although the only permissible default format may be a paper bill, the default for a particular customer could be set by the service provider to an e-bill. ComReg would welcome stakeholder's views on this issue.

2.4.3 Registering the customer's preference to 'opt-back' to the permissible default format

Customers who have opted-in to an alternative bill format may wish to 'opt-back' to one of the permissible default format(s) made available by their service provider. ComReg is of the preliminary view that the mechanisms, and timeframes, available to the customer to 'opt-back', should be equivalent to those for *opting-in* to an alternative format.

In the case of a customer opting-in to an alternative format, or opting-back to the default permissible format, the customer's agreement should again be recorded and fully auditable. Furthermore, ComReg considers that, notwithstanding any discounts that may apply, there should be no charge, penalty, or other impediment, to the customer wishing to opt-back to the permissible default format, as outlined in Section 2.5.

2.4.4 Customer 'inertia'

In some cases, where a paper bill may be the only permissible default format, customer 'inertia' may be a factor in the customer not 'opting in' and, therefore, not providing their agreement to move from a paper bill to an e-bill, even though the customer would in fact like to move to an e-bill. ComReg is considering this matter, and would welcome stakeholder's views on the extent of the issue and how it might be addressed.

- Q. 5. Do you agree with the proposed principles with respect to the mechanisms that should be in place to obtain the customers agreement to change from/to the permissible default bill format? If not, please provide reasons to support your view.**
- Q. 6. In your view, are there any circumstances where an individual customer could be moved by default by their service provider, without their explicit consent, to an e-bill, based on the method in which the customer interacts with his/her service provider? Please provide reasons to support your view.**
- Q. 7. Do you agree that, in some instances, customer ‘inertia’ is a factor contributing to customers not opting-in to an e-bill when, in fact, the customer would prefer this bill format? If you agree, please provide suggestions as to how customer ‘inertia’ could be addressed? If not, please provide reasons to support your view.**

2.5 Charging for itemised bills and application of discounts for certain bill formats

ComReg considers that there should be no additional charge to the customer to obtain at least one of the permissible default format(s). In addition, consumers with disabilities who require an alternative format, for accessibility reasons, should not have to pay an additional charge to receive their bill in such format.

ComReg recognises that, customers who receive an e-bill may, subsequently, print the bill themselves. The service provider may save money for each bill that it does not have to print, or physically distribute, and the customer may incur the cost of printing. ComReg is conscious of the merits of service providers offering discounts to consumers who opt-in to e-billing, in order to guarantee the sharing of any benefits with their customers.

- Q. 8. Do you agree with the principle that no additional charge should be applied to the customer for receiving the permissible default format(s) or, in the case of a consumer with a disability, a required alternative accessible format? If not, please provide reasons to support your view.**
- Q. 9. What are the considerations with respect to service providers charging to provide a paper bill, where a paper bill is not the permissible default format? Please provide reasons to support your view.**
- Q. 10. What is your view with respect to service providers granting a discount to customers who opt-in to an alternative bill format that it offers (e.g. an e-bill)? Please provide reasons to support your view.**

2.6 Bill layout, content and presentation

For consumers to adequately verify the charges that appear on their bill, it is important that the charges and associated details are presented on the bill (whether paper or electronic) in a transparent, consumer-friendly manner. This allows customers to easily understand and analyse its content.

To assist service providers in this objective, ComReg launched the Quality Standard for Bill Presentation⁵, developed by Excellence Ireland Quality Association (EIQA), in conjunction with ComReg in 2008. This voluntary standard promotes best practice in bill layout and presentation of charges, and other important details, and includes accessibility measures. The standard can be applied to various bill formats, including paper and e-bill.

ComReg is considering whether this standard, or aspects of it, should be adopted by all service providers and form part of the minimum requirement for itemised bills.

ComReg also notes the following with respect to bill layout and content:

- Regulation 7 of the Data Protection and Privacy Regulations, 2003 provides that, in particular, consumers have the right to request and receive bills that are not itemised, if they wish.

⁵ http://www.comreg.ie/_fileupload/publications/Final_Bill_Presentation_Standard_Dec_08.pdf

- Regulation 9 (2) of the Universal Service Regulations, 2003⁶ provides that calls that are free-of-charge to the calling subscriber, including calls to help lines, should not be identified in the calling subscriber's itemised bill.
- In 2010, ComReg amended the General Authorisation with a new provision requiring service providers to include "Consumer References" on the bill.⁷
- Service providers are subject to other legislative obligations with respect to the bills presented to their customers.

Q. 11. Do you agree with the principle that the Quality Standard for Bill Presentation, or aspects thereof, should form part of the minimum requirement for itemised bills? If not, please provide reasons to support your view.

2.7 Alerts to signal e-bill availability

For certain e-bill formats, the customer may not be made aware of when his/her bill is available. This is particularly relevant for bills that are provided on-line, rather than by e-mail. In this instance, ComReg considers that it is appropriate for the service provider to alert the customer, irrespective of the bill amount, to the fact that his/her bill is available. This should be done through an alternative mechanism to the on-line service itself (for example, by text, e-mail alert or phone call). ComReg also considers that this alert should provide certain details to the consumer, including the period of the bill, the amount of the bill and the date that payment is due.

Q. 12. Do you agree with the principle that, for certain e-bill formats, an alert, containing certain relevant details, should be provided to the customer by alternative means? If not, please provide reasons to support your view.

⁶ EUROPEAN COMMUNITIES (ELECTRONIC COMMUNICATIONS NETWORKS AND SERVICES)(UNIVERSAL SERVICE AND USERS' RIGHTS) REGULATIONS 2003, SI 308 of 2003

⁷ Response to Consultation 09/80 and Decision: Amendment to General Authorisation - New General Authorisation conditions in relation to the provision of Consumer References by Operators. <http://www.comreg.ie/fileupload/publications/ComReg1028.pdf>

2.8 Billing frequency

In most cases, the frequency of issuing a bill is aligned with the application of the subscription charge and the requirement for the customer to pay for the service used for the previous period.

ComReg is of the preliminary view that this alignment should be maintained by service providers, as it appears that the alignment of these events (the issuing of the bill, the application of the subscription charge and the request for payment) are in the interest of consumers.

Q. 13. Do you agree with the principle that the alignment of the timing of the issuing of the bill, the application of the subscription charge and the request for payment should be maintained by service providers? If not, please provide reasons to support your view.

2.9 Bills for pre-paid services

Under normal circumstances, pre-paid services, by their nature, allow consumers to monitor and control their expenditure. ComReg considers that, in most cases, pre-paid subscribers do not require a periodic bill to be issued automatically. However, ComReg is of the preliminary view that, should a subscriber to a pre-paid service require a log of transactions and associated charges for a specified period, for whatever reason, such a log should be made available.

While billing records are held by service providers for a period of time, service providers may not have a system in place to retrieve, organise and present these records for the purpose of supplying a bill to the customer. In this case, ComReg is of the preliminary view that a history of billing transactions for the specified period (not extending beyond 12 previous months), made available in print format or electronically, or, in the case of a subscriber with a disability, an accessible format, would suffice.

ComReg is also interested in eliciting the views of stakeholders on whether there are circumstances in which the customer should be charged for such a service. ComReg also suggests that in the event of a billing dispute, the service provider should provide full details of the disputed call free-of-charge to the subscriber.

Q. 14. Do you agree with the principle that, for prepaid services, a bill or at a minimum a log of billing records for a specified period, should be made available to the customer, on request? If not, please provide reasons to support your view.

Q. 15. Are there circumstances where a charge would be applied to the customer who makes a request to receive a bill, or a log/history of billing records, for prepaid services for a specified period? Please provide reasons to support your view.

2.10 'Other' customer correspondence

ComReg recognises that 'other' important correspondence (for example, Notifications under Regulation 17(4)⁸) may be issued to consumers via various means. ComReg considers that the customer's preference for a particular type of bill format is separate from the mechanism used for 'other' correspondence.

Q. 16. Do you agree with the principle that the customer's chosen format for their bill is separate from the mechanism used for 'other' correspondence? If not, please provide reasons to support your view.

⁸ European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003 ("the Regulations") which transpose into Irish law the provisions of Directive 2002/22/EC of the European Parliament and the Council of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services ("Directive 2002/22/EC").

3 Submitting Comments

The Commission welcomes all written responses from stakeholders by 13th January 2011. ComReg will, in the interests of openness and transparency, publish all non-confidential inputs received and would, therefore, request that electronic submissions be made in an unprotected format so that they can be published electronically. Submissions will be published, subject to the provisions of ComReg's Guidelines on the Treatment of Confidential Information (see ComReg Document No. 05/24). Any confidential material should be clearly identified and placed in a separate Annex to stakeholder's response.

Appendix A – Consultation Questions

List of Questions

- Q. 1. Do you agree with the principle that electronic communications service providers should provide detailed information, as outlined above, for consumers with respect to any e-billing service that they offer? If not, please provide reasons to support your view..... 6
- Q. 2. Do you agree with the principle that ComReg should establish a permissible default bill format(s) for each service, taking into account the nature of the service and the nature of the charges? If not, please provide reasons to support your view. 7
- Q. 3. Do you agree with the principle that providers of electronic communications services should offer an alternative bill format, free-of-charge, to a particular customer with a disability, if the default permissible format(s) is not accessible by that customer? If not, please provide reasons to support your view. 8
- Q. 4. Do you agree with the principle that the customer must explicitly agree, or opt-in, to moving to a particular bill format, including an e-bill, other than the permissible default format? If not, please provide reasons to support your view. 8
- Q. 5. Do you agree with the proposed principles with respect to the mechanisms that should be in place to obtain the customers agreement to change from/to the permissible default bill format? If not, please provide reasons to support your view..... 10
- Q. 6. In your view, are there any circumstances where an individual customer could be moved by default by their service provider, without their explicit consent, to an e-bill, based on the method in which the customer interacts with his/her service provider? Please provide reasons to support your view..... 10
- Q. 7. Do you agree that, in some instances, customer 'inertia' is a factor contributing to customers not opting-in to an e-bill when, in fact, the customer would prefer this bill format? If you agree, please provide suggestions as to how customer 'inertia' could be addressed? If not, please provide reasons to support your view..... 10
- Q. 8. Do you agree with the principle that no additional charge should be applied to the customer for receiving the permissible default format(s) or, in the case of a consumer with a disability, a required alternative accessible format? If not, please provide reasons to support your view. 11
- Q. 9. What are the considerations with respect to service providers charging to provide a paper bill, where a paper bill is not the permissible default format? Please provide reasons to support your view..... 11
- Q. 10. What is your view with respect to service providers granting a discount to customers who opt-in to an alternative bill format that it offers (e.g. an e-bill)? Please provide reasons to support your view. 11

- Q. 11. Do you agree with the principle that the Quality Standard for Bill Presentation, or aspects thereof, should form part of the minimum requirement for itemised bills? If not, please provide reasons to support your view. 12
- Q. 12. Do you agree with the principle that, for certain e-bill formats, an alert, containing certain relevant details, should be provided to the customer by alternative means? If not, please provide reasons to support your view. 12
- Q. 13. Do you agree with the principle that the alignment of the timing of the issuing of the bill, the application of the subscription charge and the request for payment should be maintained by service providers? If not, please provide reasons to support your view. 13
- Q. 14. Do you agree with the principle that, for prepaid services, a bill or at a minimum a log of billing records for a specified period, should be made available to the customer, on request? If not, please provide reasons to support your view. 14
- Q. 15. Are there circumstances where a charge would be applied to the customer who makes a request to receive a bill, or a log/history of billing records, for prepaid services for a specified period? Please provide reasons to support your view. 14
- Q. 16. Do you agree with the principle that the customer's chosen format for their bill is separate from the mechanism used for 'other' correspondence? If not, please provide reasons to support your view. 14