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31 January 2014

Chief Executive Officer  
Office of the Chief Executive Officer  
NICTA  
Frangipani Street,  
Hohola  
National Capital District

Dear Mr.Punaha,

## **Bmobile Submission to NICTA in response to Consultation Paper on Draft Consumer Protection Rule**

### **Introduction**

Bmobile has prepared this response to the Consultation Paper on the Draft Consumer Protection Rule.

The structure of this response is to comment generally on sections 1 and 2 of the Consultation Paper and then to respond to Attachment A: Draft Rule in more detail

### **Responses to Sections 1 and 2**

Bmobile has prepared this response to the paper on the introduction of a Consumer Protection Rule. It is agreed that customers who purchase services have a right to understand the service characteristics and service levels their service provider intends to deliver while they are customers. Bmobile publishes a range of information on services, prices, conditions of use and how to contact the company for information and assistance. Consumers are able to access this information online or from Bmobile retailers in printed form, and other telecommunications service providers provide similar information on their products and services.

We note NICTA's view that there is a need for a minimum set of information to be published to allow consumers the make some assessment of the quality of services offered.

Bmobile supports the need to inform consumers of the services offered, their characteristics, prices and service levels that apply.

## Responses to Attachment A: Draft Rule

We note the comments in Section 5 regarding the publication of accurate, relevant, current and easily understood information regarding retail services and agree that these information services are necessary for consumer consideration of Bmobile services.

We also note that the recommendation relates to the provision of this information from the service provider web site and in printed form in retail outlets.

Section 6 describes the requirements of a Consumer Guide and we make the following comments:

- Bmobile agrees in principle that the publication of a Consumer Guide offers value to consumers and can provide consistent information on services and their conditions and support.
- In section 2, we make the following comments on the 13 suggested matters to be addressed in the Consumer Guide:
  - Items 2 b, c,d, h, l, j, and k appear to be service specific and so may vary between services. We suggest the detail of these matters would be best published in service descriptions such as for mobile voice and data services.
  - Items 2 a, e, f, g, and l appear to be largely not service specific and can be published in the same format for all services if relevant and likely to be of use to the consumer.
- Consumers are increasingly able to connect to the internet and to consider services on offer through the service providers web site. We recommend that all information to be provided to consumers be in the first case be located on the service provider's web site because this is relatively easy to keep current from one data location.
- Printed material may not be current at all times and it is not practical or reasonable to require that this information is current.
- The suggestions in items 4 to 9 regarding regulation of Consumer Guide content may be expensive to oversee and manage for NICTA, and incur additional costs for the service provider. We recommend in the first place the publication of a recommended Consumer Guide by NICTA for service providers and that the market be subject to self regulation for at least 12 months before any form of regulation is considered by NICTA. This approach reduces the cost of management for NICTA and allows service providers to innovate as they deliver services information to consumers without the constraints of a regulatory process that may not meet the needs of all consumers. At the end of the period of self regulation, NICTA would be in a better position to consider the need for regulation and it's format.

Yours sincerely



Raj Deo  
CEO (PNG) & Regional CTO