

## NOTIFICATION OF INTENTION TO GIVE METERING AND BILLING APPROVAL – REVIEW OF COMMENTS

**Communications Provider:** British Telecommunications PLC

**APPROVALS:** MET.0001, 0003, 0015

The originals of all comments in response to this consultation are held on file at BABT.

Ref:	Comment	BABT's Response
T-Mobile: Eric Priezkalns (EP)		
EP 1	This was a lengthy submission in which a number of points were made concerning the detailed description of services in the scope of the proposed approval. It further argued the need for them to be understandable to informed readers of the certificate.	We agree in general with the points made. However, BT is one of the communications providers transferring its Approval from the OTR003: 1993 régime. As we stated in a previous consultation, under our Certification Accreditation we can only Approve what has been applied for. As and when applications for new and modified services are made, we will encourage applicants to specify the relevant services as part of their applications. The point is made: "With very little information on scope, it is very hard for an external observer to tell where one TMBS ends and another begins". It is not necessarily the case that an improvement in description will improve public understanding. For example, access to BT's Cashless Services TMBS is gained via the PSTN TMBS. It is noted that the substance of the notifications is not in question.
EP 2	A further lengthy submission in which number of points were made concerning the Ofcom administrative arrangements for the consultation and Notification thereof and the respondent's consequent confusion between the roles of regulator and approval body.	<p>Any comments relating to Ofcom's administrative arrangements are outside the scope of this consultation and have been referred to it for direct response.</p> <p>Our Notices make clear that representations are made to the Approval Body. If there are matters that require a response by Ofcom then we will pass them on and advise the responder accordingly.</p> <p>On a related matter, we have been asked by Ofcom to publish the replies to our consultations and our considered responses. So as to ensure compliance with Data Protection we will be asking responders in future Notices to identify any part of their responses that they do not wish to be published.</p>

Ref:	Comment	BABT's Response
BSI Product Service: Mike Inman (MI)		
MI1	BSI responded positively to this Notification and congratulated BT on its achievement. BSI stated that the response did not prevent a subsequent Approval decision, by BABT, to give Approval as described by MET.00001, MET.0003 and MET.0015 to BT, although it did have some comments of an administrative rather than a technical nature to make.	It is noted that BSI's comment relates to how it considers Ofcom should publish its Notification, rather than how BABT should publish the notice to which an Ofcom Notification refers. Such comments relating to Ofcom's administrative arrangements are outside the scope of this consultation and have been referred to it for consideration and direct response. It is noted that "this response does not prevent a subsequent Approval decision".

Modifications made to the approval documents as notified:

1. Actual dates inserted

Paul Ebling

Manager, Metering & Billing, BABT

17<sup>th</sup> February 2004