

Digital Comparison Tools Market Study:

Update Paper - Response form

1. Thank you for taking the time to respond to the questions in the Update Paper for our Market Study of Digital Comparison Tools (DCTs), published on our [website](#) on 28 March 2017.
2. Please download and save this form before completing it. Please submit your response by **5pm on Monday, 24 April 2017**, either by:
 - Email to: comparisontools@cma.gsi.gov.uk.
 - Or by post to: Digital Comparison Tools Market Study
Competition and Markets Authority
7th floor
Victoria House
37 Southampton Row
London WC1B 4AD
3. Please note:
 - You can choose which questions to respond to, but we ask all respondents to provide a small amount of background information at the start of this form. The boxes will 'expand' to accommodate long responses if required.
 - We are particularly keen to receive evidence in support of responses. If you are able to supply evidence please attach this with your response.
 - We intend to publish responses to our Update Paper in full. If you wish to submit information that you consider to be confidential, this should be indicated to us clearly and an explanation given as to why you consider it to be confidential.
 - The CMA may use the information you provide for the purposes of facilitating the exercise of any of its statutory functions. This may include the publication or disclosure of the information. Prior to publication or disclosure, in accordance with its statutory duties under Part 9 of the Enterprise Act 2002, the CMA will have regard to (among other considerations) the need to exclude, so far as is practicable, any information relating to the private affairs of an individual or any commercial information relating to a business which, if disclosed, would or might, in our opinion, significantly harm the individual's

interests or, as the case may be, the legitimate business interests of that business (confidential information). Further information about how the CMA will use information submitted during the Market Study can be found on our [website](#).

4. If you have any questions about our Market Study or this online form please contact the team at comparisontools@cma.gsi.gov.uk.

Your details

(Fields marked * are required)

Title*	MR
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Forename	JONATHAN
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Surname*	INGRAM
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Email*	
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What is your role / profession*	CHIEF OPERATING OFFICER
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Are you representing yourself or an organisation?*	Yourself / An organisation (please delete as appropriate)
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If you are representing yourself rather than an organisation would you be content for us to include your name when we publish your response?*	Yes / No (please delete as appropriate)
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If you are representing an organisation:

(a) What is the organisation's name?*	DECISION TECHNOLOGIES LIMITED
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(b) Please could you briefly explain the role of your organisation, including the sectors in which it operates or has most interest?*
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Decision Technologies Limited operates a broadband DCT under the broadbandchoices.co.uk website / brand and provides broadband DCT partner white label services to approximately 50 third parties.

Consumers

1. Should we focus our attention on the consumer groups we identify in Chapter 5 (see paragraphs 5.82 to 5.95) and if not, what groups should we focus on?

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2. In which sectors do DCTs not currently play a major role but could in principle offer substantial benefits to consumers? Why have they not become established in these sectors?

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3. How has the growing use of DCTs affected suppliers' offers to consumers who do not use DCTs in our case study sectors and more broadly? What impact have DCTs had on suppliers' ability to discriminate between active and inactive consumers? What are the implications for vulnerable consumers?

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4. What factors, if any, have we missed that may be holding back consumers from using DCTs?

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5. What, if anything, should be done about consumers' concerns about data sharing and the extent to which they feel in control?

6. What actions, if any, are needed to improve the way consumers use DCTs – including multi-homing and using DCTs' functionalities such as filtering and ranking?

Inputs to DCTs

7. Have we captured the range of issues that might prevent DCTs from operating effectively?

8. Do the issues identified materially affect DCTs' ability to operate effectively and deliver good consumer outcomes?

9. Are current or planned initiatives sufficient to address the issues found?

There are no clearly defined current or planned initiatives that will adequately address the dearth of data made available from broadband Suppliers to DCTs with respect to accurate speed and granularity of availability data.

The two items identified in the update paper ((i) the Digital Economy Bill providing Ofcom with greater ability to obtain and secure publication of data; and (ii) the possibility of the EC proposing changes to the European Electronic Communications Code stipulating the rights to published information) are non-specific in terms of data; non-specific in terms of timelines; and non-specific in terms of a proposed solution.

Competition

DCTs' market position and barriers to entry and expansion

10. What explains the strong position of a specific DCT in each of our case study sectors? What do DCTs do to grow their business in sectors where they appear to be relatively small compared to the leading DCT of the sector?

11. What are the barriers, if any, for DCTs to enter or expand into sectors where they currently do not provide comparison services or where they are currently relatively small?

Agreements between DCTs and suppliers

12. What has been the impact of the removal of wide MFNs in the private motor insurance sector?

13. What has been the impact of narrow MFNs in the sectors where we have observed them (home insurance, private motor insurance, credit cards, broadband and flights)?

14. What is the commercial rationale for the non-brand bidding and negative matching agreements we have observed (in all of our case study sectors) and what is their commercial and competitive impact?

15. What is the commercial rationale for the non-resolicitation agreements we have observed (in home insurance and energy) and what is their commercial and competitive impact?

16. In which other sectors, if any, are (i) wide or narrow MFNs; (ii) non-brand bidding or negative matching; or (iii) non-resolicitation agreements in place? What impacts do they have in these sectors?

17. Are there any other agreements in place that may affect the effectiveness of DCTs and/or the effectiveness of competition between DCTs (and competition between DCTs and other sales channels)?

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Unbundling and hollowing out

18. How has the growth of DCTs affected product features and/or the product mix in our case study sectors over time? What specific evidence/examples indicate these changes?

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19. How widespread is the use of product reviews and ratings on DCTs and what has been the impact, if any, of the use of these tools?

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20. What needs to be in place to prevent or mitigate any harmful impact of product unbundling or hollowing out and what can DCTs do about it?

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Regulation

21. What are your views on the issues we list in Table 8.1 and at paragraphs 8.13 to 8.42 of Chapter 8 and how could they be addressed?

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22. What is the balance between potential benefits and risks in introducing a cross-sector approach? What would be the most effective approach(es), and why?

The five, common cross-sector principals identified in the update report are logical and pertinent to the Consumer. Whether these would be best served through a single accreditation / compliance scheme or as a unifying set of principles to be added (as necessary) to existing, sector-specific schemes is debatable.

If the former, then careful consideration will need to be given as to the practicalities of establishing the necessary administrative framework to implement and regulate the principals and DCT compliance.

With regards to the principals themselves, it should be noted that there are currently hurdles highlighted elsewhere in the update report that would need to be addressed. For example, broadband DCTs' abilities to meet accuracy undertakings would need to be evaluated in the context of accurate and consistent data not currently being made readily available by Suppliers (speed and address-level availability, for example).

23. How could a cross-sector approach interact with existing regulatory frameworks?

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The future of DCTs

24. What future developments outlined in Chapter 9 are likely to have the greatest impact in driving engagement? If there are any important developments we have missed, what are they and why are they important?

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25. What future DCT-related technologies might affect or assist vulnerable consumers?

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Other comments and further contact

We welcome submissions on any of the issues we address in our update paper from interested parties. We would particularly like to hear views, supported wherever possible by evidence, on the following themes if not already addressed above:

- a) What DCTs do and the benefits they can offer.
- b) Consumers' views on and use of DCTs.
- c) Inputs to DCTs.
- d) Competition between DCTs and between DCTs and the suppliers whose services they compare.
- e) Regulation of DCTs.
- f) The future of DCTs.
- g) The focus of the second part of the market study.

Do you have any other comments you would like to add?
NIL

Would you be willing for us to contact you to discuss your response?*	Yes / No (please delete as appropriate)

Thank you for taking the time to complete this form.

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