

Annex

Billing and Metering Regulation Questions

1. **Article 1: Definitions**

Question: Do you consider the definitions in Article 1 sufficient?

If not, please give reasons and state which terms you think should be added or omitted.

2. **Article 2: Purpose**

Question: Do you agree with the purpose and intent of the Regulation?

If not, please state why you disagree and what wording should be added, omitted or amended.

3. **Article 3: Scope of the Regulation**

Question: Do you agree that the Regulation should only apply to Affected Licensees (as defined), with the exception of Articles 4.2 and 8 which apply to all Licensed Operators?

If not, please state why.

4. **Article 4: Liability of Affected Licensees**

Question: Do you agree that billing records should be retained for a period of at least 12 months from the date on which the relevant record was created or, if a complaint is made, for 12 months from the date the complaint is first submitted to the Affected Licensee?

5. **Article 5: Scope of Billing Processes included within a BMS**

Process Management

Question: Do you agree that the Affected Licensee shall have implemented the requirements of ISO9001: 2015 (or an equivalent standard) as the method of demonstrating process control?

If not, please state why, if you consider an alternative standard is more appropriate, please identify the standard.

Question: Do you agree that it is not a requirement for the quality management system to be certified by an accredited certification body?

If you believe the quality management system should be certified, please give your reasons.

Mandatory Documents

Question: Do you agree with the requirement to produce the System Functional Description Document and Performance Reporting Document that shall be shared with the TRA?

If you do not agree, please state why and what alternative you would propose.

Question: Do you agree with the requirement to report performance data to the TRA via the quarterly Performance Reports to demonstrate ongoing Compliance?

If not, please state why and what alternative you would propose.

Question: Do you agree that 4 weeks after the end of a reporting period is sufficient time to produce Performance Reports and 1 week to deliver to TRA is acceptable?

If not, please explain why.

Risk Management

Question: Do you agree that an Affected Licensee should be required to fully implement the requirements of ISO9001: 2015 clause 6.1 Action to address risks and opportunities?

If not, please explain why, what alternative approach would you suggest.

Question: Do you agree that a Billing / Metering system should be subject to impact assessment and risk review when changes are proposed, and the proposed changes shared with the TRA before implementation?

If not, please explain why.

Question: Do you agree that risks should be mitigated (treated)?

If not, please explain why.

6. Article 6: Approval Process

Question: Do you agree that once an Affected Licensee is provided with an Initial Assessment by the Audit Body then it must produce a Project Plan within three months?

If not, please suggest an alternative timescale and your reasons.

Question: Do you agree that an Affected Licensee must achieve compliance within twenty-four months of the Effective Date?

If not, please suggest an alternative timescale and your reasons.

Question: Do you agree that the Initial On-Site Review and Initial Document Review should take place within [3][6] months of the Effective Date?

If not, please suggest an alternative timescale and your reasons.

Question: Do you agree the Audit Programme should be a combination of internal and External audits, or should they be only external audits?

If not, please explain why.

Question: Do you agree with the requirements for demonstrating compliance with the Regulation set out in Article 6.6.

If not, please explain why.

7. **Article 7: On-going Compliance**

Question: Do you agree that ongoing compliance should be demonstrated by a programme of annual audits and the submission of quarterly Performance Reports?

If not, please explain why.

Question: Do you agree that ongoing compliance should be fully assessed over a 3 year period by means of on-going audits and compliance programmes?

If not, please suggest an alternative timescale and your reasons.

8. **Article 9: Role of the Audit Body**

Question: Do you agree that any appointed Audit Body should be accredited to ISO17021: 2015 (or later editions) with a scope that includes Telecoms (Storage & Communication) and Information Technology (EA codes 31/2 and 33, SIC Code 481)?

If not, please explain what standard an Audit Body should be accredited to and what scope.

9. **Annex 1 – Indicative Measurement and Performance Requirements**

Question: Do you agree with the Measurement Criteria and their associated Allowable Tolerances set out in Annex 1?

If not, please state why and suggest any alternatives.

10. **Annex 2 - Controls Framework**

Question: Do you agree that all the controls identified within the Controls Framework (Annex 2), are clearly described and unambiguous, non-discriminate, proportionate, achievable within the compliance timescales of the Regulation and not imposing an unreasonable financial burden to comply with one or more controls.

If not, please explain which control(s) are not clearly written, are unachievable within the timescales or impose an unreasonable financial burden.