



**Commission for  
Communications Regulation**

## **Excellence in Telecommunications Bill Presentation**

### **Bill Presentation Standard for Telecommunications Service Providers**

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## Abbreviations:

<b>ComReg</b>	<b>Commission for Communications Regulation</b>
<b>NALA</b>	<b>National Adult Literacy Agency</b>
<b>NCBI</b>	<b>National Council for the Blind of Ireland</b>
<b>NDA</b>	<b>National Disability Authority</b>
<b>RNIB</b>	<b>Royal National Institute of Blind People</b>

## 1. Foreword

This standard has been developed, by ComReg in association with EIQA (Excellence Ireland Quality Association), for telecommunications companies operating and providing services to both business and residential consumers in the Irish market.

It is a voluntary standard and has been developed to drive improvements for telecommunications consumers in terms of clarity and transparency of charges applied on bills.

## 2. Background

In 2006 and 2007, the most prevalent category of consumer contacts to ComReg's consumer care team related to billing issues.

Further analysis of these issues reveals that there is significant confusion among consumers who do not understand their bill or find it difficult to interpret and verify the contents of the bill they receive from their electronic communications service providers. Additionally, many providers now offer bundled services to their customers. This has the potential to lead to increased bill complexity for consumers.

As communications services become increasingly important in allowing people to participate in social and economic life, ComReg wants to ensure that all consumers have confidence in the services being provided. It is essential, therefore, that billing documentation is transparent and easy to use and understand. This will facilitate easier identification and reporting of billing errors, should they occur.

While improvement in bill presentation is a key consideration for service providers themselves, ComReg feels that the most appropriate way to encourage improvement in the standard of bill presentation is the development and adoption of a Bill Presentation Standard.

ComReg has worked with EIQA and representatives from various consumer organisations and agencies to develop the standard, audit mechanism, accreditation levels, audit timeframes and costs. The standard is aimed at addressing the issues consumers have with their bills in terms of understanding, as reported to ComReg and other agencies. ComReg intends to approve, review and modify this standard on a periodic basis.

Service providers who wish to be accredited will submit their bill documentation/bill formats to be audited and accredited by EIQA on a periodic basis. ComReg intends to publish details on its websites and other materials of those electronic communications services/packages which meet the agreed accreditation levels against the standard. This, we anticipate, will drive improvements in current billing standards and will assist consumers in evaluating service providers and their offerings.

### 3. Objectives

ComReg has a stated objective to 'Support and encourage improvements in the quality of customer service and the overall consumer experience of the communications sector' (Reference: Section 5.3 ComReg Strategy Statement 2008 - 2010 [ComReg 07/104](#)). To this extent, ComReg wants to encourage all service providers to give their customers access to bills that are clear, unambiguous and accurate.

This standard provides objective criteria against which the overall presentation and clarity of billing information provided to consumers by telecommunications companies can be assessed.

The objectives of this standard are to promote informed customer choice and to encourage service providers to provide their customers with bills that:

- present the charges clearly
- have a simple and readable layout
- contain unambiguous information and a simple language
- contain all information necessary to enable a customer to switch service to an alternative operator
- provide sufficient information to enable customers to verify the charges being applied
- are consistent with the sales experience and terminology of products offered
- adhere to the agreed methods of availability (hardcopy, on-line etc), timeframes for arrival and payment options and terms

## 4. Scope

This standard deals with Customer Billing in relation to telecommunications activities, as defined in Communications Regulation Act 2002, and the Communications Regulation (Amendment) Act, 2007.

The standard applies to all carriers and carriage service providers operating and providing services in the Republic of Ireland.

The standard sets out requirements for:

- What items a bill should contain
- Bill layout and format
- Ease of reading
- Alignment of terms with sales and tariff documentation
- Placement and clear labelling of switching references
- Service provider contact details for enquiries, including complaints
- How all charges, credits, discounts and payments should be presented
- Transparency of billing periods for charges and payment due dates
- Availability of alternative formats
- Availability of itemised billing

This standard does not encompass the following:

- Inter-carrier or Wholesale Billing practices, except where there are direct impacts on or implications for consumers, or as otherwise specified in the standard
- The billing of goods and services provided, or passed on, by a service provider in relation to specific works and commercial arrangements that are not the service provider's market offerings
- Adherence to the agreed timeframe between billing and collection of monies due
- Accuracy of pricing, or billed amounts

- Certification or accreditation of the service provider's billing system
- Accuracy or validity of administration charges applied for processing of payment by direct debit, cheque, standing orders etc.
- Determination of bill issuing dates and credit periods for settling bills
- Adherence by service providers to data protection legislation (Data Protection Acts 1988 and 2003) and other legislative obligations

## 5. Bill presentation standard

### 5.1 Billing information

Service providers should provide the customer with a bill and with access to further information required by the customer to understand and verify the content of the bill.

5.1.1 The service provider should provide specific contact information on the bill where customers can obtain information on their current bill and its content and on the service provider's terms and conditions of business

5.1.2 The service provider should provide specific contact information on the bill where customers can obtain information on current pricing for products and services supplied

#### 5.1.3 Billing options

The service provider should provide a range of billing options which endeavour to meet the needs of all customers

5.1.3.1 The billing options available to customers should be described on the bill

5.1.3.2 Where different bill formats are available, the service provider should make it clear on the bill how these can be requested and provide contact details to help the customer make the change

#### 5.1.4 Billing frequency

The service provider should bill for charges due on a timely and regular basis

5.1.4.1 The frequency of billing (e.g. monthly) should be clearly stated on the bill and in the service provider's terms and conditions

#### 5.1.5 Bill payment options

The bill payment options available should be clear and should meet the needs of all customers

- 5.1.5.1 The service provider should ensure that information relating to the charges associated with late payment and non-payment is on the bill
- 5.1.5.2 If payment slips are provided, they should clearly and unambiguously display the following details:
  - Customer Account name
  - Customer Account number
  - Bill number
  - Date of bill
  - Date payment due
  - Total payment due (if the amount due is zero then show “€ 0”)
- 5.1.5.3 If payment is being collected by direct debit, the collection date for payment should be clearly shown on the bill
- 5.1.5.4 Once payment is collected or received by the service provider, the collected amount and a statement of acknowledgement should be clearly shown on the next bill issued (ref. bill summary 5.4.2)
- 5.1.5.5 Where additional charges are made for payments by credit card and other payment methods, these must be clearly shown on the bill
- 5.1.6 Billing enquiries

The service provider should provide contact details for customers to make enquiries, including complaints, in relation to their bill.
- 5.1.6.1 The contact details for bill enquiries should be clearly stated on the bill and should include telephone, email and postal contact details

- 5.1.6.2 The service provider should clearly state on the bill the hours of business
- 5.1.6.3 The service provider should clearly state on the bill if charges apply for making calls to this service

## 5.2 Bill content

The content of each bill issued by the service provider should provide adequate information on the customer's account, contract details, products and services purchased, payments due, etc., to ensure understanding and verification.

5.2.1 All bills issued by the service provider, regardless of format and payment type, should provide the following information as standard:

- Customer name for billing purposes
- Customer's billing address
- Customer Account number
- Customer's telephone number(s) as applicable for this bill
- Service provider's name, trading address and VAT registration number
- Universal Account Number / UAN (full title and abbreviation) where applicable
- Billing period(s) for all charge types
- Bill date
- Bill number
- Description of all charges, credits and discounts applied
- Description of all charges relating to premium rate services
- Total of charges, credits, discounts, payments made and net amount due for payment
- Description of payment methods
- Date payment is due
- Contact details for billing information and customer queries

5.2.2 The customer should be informed how to read the bill and of the meaning of each term and/or heading included on the bill

5.2.3 The service provider should provide customers with the option of obtaining their own historical usage data on request. This information

should be provided in a clear and unambiguous format which is easy to read e.g. pictorial or graphical format

5.2.4 The contract period start date and end date should be clearly shown

### 5.3 Bill layout and format

The service provider should ensure that the bill is presented in a way that assists with understanding and comprehension of the bill.

5.3.1 The service provider should ensure that individual billing items are described in sufficient detail so that the customer can understand what they are, and what they relate to

5.3.2 The different elements of the bill should be clearly spaced and presented in a logical way to aid customer's understanding

5.3.3 At a minimum, the following key items should be provided on the front page of the bill:

- Customer name
- Customer Account number
- Customer billing address
- UAN or Universal Account Number (where applicable)
- Customer telephone number
- Billing period(s)
- Billing reference number
- Bill date
- Contact details for billing enquiries
- Contract period dates
- The Customer Account number and UAN should be displayed in bold

5.3.4 A summary of the bill should be provided on the first page. The font size used should be a minimum of 14 pt font and at least one size larger than remaining billing details (ref. 5.4.2 Bill Summary)

- 5.3.5 Charges, credits and discounts should be dealt with under separate headings; so that it is clear what is being charged for and what credits/discounts are due
- 5.3.6 Charges for calls, services and equipment rental (including line rental where applicable) should be identified separately on the bill
- 5.3.7 Where more than one billing period applies to charges presented on the bill (i.e. some charges may be billed in advance, others in arrears), the service provider should ensure that these periods and the charges they apply to are clearly identified on the bill and can be easily distinguished by the customer
- 5.3.8 There should be a consistent spacing between lines of text to create an open and inviting document
- 5.3.9 All pages on the bill should be clearly numbered and this should be shown on the bill

#### **5.4 Bill charges**

Sufficient information should be on the bill or otherwise readily available to the customer to enable verification that the charges are correct.

- 5.4.1 The service provider should ensure that all charges on the bill can be verified by the customer as being consistent with:
- the customer's contract terms and what they have used or requested
  - the service provider's published rates and discounts
  - third party credits (e.g. Telephone Allowance in the Household Benefits Package)
  - third party payments (e.g. dial-up internet charges)

- 5.4.1.1 Any payments made to third parties as part of the customer's contract (i.e. agreed charitable or otherwise donations) should be either specified on the bill or made available on request.
- 5.4.1.2 The service provider should ensure that third party charges or payments included in the Bill can be readily identified by the customer as applying to the relevant third party or the service/product supplied (including premium rate services)
- 5.4.1.3 The service provider should make available, either with the bill or on request, an itemised list of all charges applied, including premium rate services.

#### 5.4.2 Bill summary

The service provider should provide a summary of bill charges with every bill issued to the customer. The bill summary should clearly and unambiguously describe:

- Total of previous bill
- Payments made during the billing period
- Balance at the beginning of the billing period
- Charges applied under product heading/package heading
- Charges applied outside product/package
- Total discounts applied
- Total credits applied
- Total paid to third parties (including premium rate services)
- Total payment due (if no payment is due, or the account is in credit, this value should be zero)
- VAT rates applied and total VAT being charged

#### 5.4.3 Bill details

A full breakdown of all credits, discounts and charges (product or service) applied should be provided on each bill issued by the service provider, specified under separate relevant headings

#### 5.4.4 Itemised bill

The service provider should make an itemised description of all timed call charges or activity within the current billing period available to the customer. This should be provided with the bill or on request.

Freephone numbers should not be identified on the consumer's itemised bill.

5.4.4.1 The service provider should make clear on the bill how further itemised bill information (itemised charges for un-timed and/or local calls, details on past charges) can be obtained

5.4.4.2 Information on past charges should be available to the customer for at least the previous two billing periods prior to the current billing period.

5.4.4.3 Where applicable, the service provider should inform customers of any notice period required to obtain itemised billing, and any relevant charges

#### 5.4.5 Charges for Bundles or Packaged products and services

If the customer has purchased a package or bundled product or service the service provider should provide a full breakdown of:

- the package entitlements and VAT inclusive price
- what has been used by the customer during the current billing period, both included and excluded from the package
- any unused credit brought forward, where appropriate
- charges outside the bundle and the relevant rates applied

#### 5.4.6 Overdue charges

The service provider should make a clear distinction on the bill between the due date of any outstanding payments and the due date for current charges on the bill

#### 5.4.7 First and final Bills

The service provider should clearly and unambiguously identify first and final bills, using a clear heading at the top of the first page of the bill

5.4.7.1 Once-off charges which relate specifically to a first bill (i.e. connection charges, purchase of equipment) should be clearly identified under a separate heading

5.4.7.2 Once-off charges which relate specifically to a final bill (i.e. disconnection charges) should be clearly identified under a separate heading

5.4.7.3 Any final credit due should be clearly identified under a separate heading

5.4.7.4 Payment of final credit due should be included with the final bill or information provided on the bill on where and how to obtain the payment

## 5.5 Accessibility

The service provider should provide billing information that is accessible to all customers.

5.5.1 All bill items should be described in clear and simple language so that they can be easily understood by the customer. All text should meet a Flesch reading ease of 60 or above

5.5.2 The service provider should ensure that the bill is clear and easy to read. Clear Print principles should be applied (ref. NDA Guidelines for Print Media, NALA - Plain English Service Booklet, NCBI - Make it clear). At a minimum, the following principles should be adopted:

- The type size on the bill summary should be 14 pt or greater. The typeface on detail pages should be 12 pt or greater (ref. NDA Guidelines for Print Media)
- San Serif font typeface should be used. Examples of San Serif typefaces include Gills Sans, Arial, Helvetica
- Bold weight typeface should be used for emphasis only
- Capital letters for full sentences, underlining and italic script should not be used in words, titles or body text of the bill
- Words or text should not be split with hyphens
- Keep the same amount of space between each word
- Text must be left aligned
- Text should be set horizontally. Vertical, slanted or angled text should not be used
- Present information in a list rather than a table or multiple columns and use pre-set tabs for consistency
- A consistent bullet style to be used throughout the bill and supporting documents

- 5.5.3 The service provider should ensure effective use of colour contrast on all bills issued to aid readability (ref. RNIB guidelines “See it Right”)
- 5.5.3.1 At a minimum, the service provider should use dark coloured text on white or light coloured paper or background
  - 5.5.3.2 The service provider should use foreground and background colour combinations which provide sufficient contrast when viewed by someone with colour deficiency or when viewed on a black and white screen
  - 5.5.3.3 The service provider should limit the use of colour on bills and use those that provide a good differentiation for people with colour deficiency. Coloured text should not be used to portray meaning (e.g. red text for negative numbers).
  - 5.5.3.4 The service provider should ensure that formats of bills issued do not vary between regular and reversed type (e.g. light text on a dark background)
- 5.5.4 At a minimum, enlarged print bills (e.g. A3 photocopy) providing 16pt font size or greater should be available on request
- 5.5.5 The service provider should make audio bills or talking bills available to customers on request (ref. 5.1.3.2)
- 5.5.6 Where the bill refers the customer to the service provider’s website, the service provider should ensure that the website meets recognised accessibility standards (e.g. Web Accessibility Initiative standard)
- 5.5.7 The service provider should make Braille bills available to customers on request

#### 5.5.8 Billing terms

Billing terms used should be standardised to ensure consistency in language used and to assist the customer in understanding the bill.

5.5.8.1 The service provider should standardise the terms used on the bill and apply them consistently

5.5.8.2 All terms used to describe items in the bill should correspond to those used in sales information and contract documents

## Appendix 1 Reference sources

NALA: Writing and design tips

[http://www.nala.ie/download/pdf/writing\\_design\\_tips.pdf](http://www.nala.ie/download/pdf/writing_design_tips.pdf)

NCBI: Make it clear [http://www.ncbi.ie/files/Make\\_It\\_Clear\\_NCBI.doc](http://www.ncbi.ie/files/Make_It_Clear_NCBI.doc)

NDA: Guidelines for print media <http://accessit.nda.ie/it-accessibility-guidelines/smart-cards/guidelines/smart-card-guidelines/literature-application-forms>

RNIB: See it Right guidelines

[http://www.rnib.org/xpedio/groups/public/documents/publicWebsite/public\\_see\\_itright.hcsp](http://www.rnib.org/xpedio/groups/public/documents/publicWebsite/public_see_itright.hcsp)

Flesch Reading ease - [http://en.wikipedia.org/wiki/Flesch\\_reading\\_ease](http://en.wikipedia.org/wiki/Flesch_reading_ease)

## **Appendix 2    Definitions**

### **Accessibility**

This is a general term used to describe the degree to which a bill is accessible to as many people as possible, including those with disabilities.

### **Account**

This means the Service provider's record of a Customer including Bill and associated Charges, and of billing arrangements with the Customer, including Customer information to assist with Customer enquiries and credit assessment and management.

### **Approval Body**

The accreditation body appointed by ComReg to assist with developing the standard and assess compliance with this standard.

### **Bill**

An invoice or statement, including paper and electronic, from a service provider to a Customer with the prime purpose of advising the customer of the amount due for payment by the Customer for goods and services purchased, requested, acquired or used by the Customer in the Billing Period

### **Billing Enquiry**

A request to a service provider by a customer for information about charges or other content on the service provider's Bill, or about other aspects of the service provider's billing service, relevant to that customer.

### **Billing Period**

A period of time, typically a month or quarter, or the date/s to which charges on a bill relate to.

**Charge**

The tariff or fee levied by a service provider for the provision of a telecommunications product, service or transaction; or for a third party product or service.

**Customer**

A person or entity that has a contract with a service provider for the supply of a telecommunications product or service.

**Credit**

The amount repaid or deducted by the service provider from the total amount due on a customer's bill, either from payments made by the customer within the billing period, refunds made by the service provider for charges applied in error or for unused service billed for or allowances from the Department of Social and Family Affairs

**Discount**

Defined as a pricing offer resulting in variation from the original advertised price. This is in the Customer's favour from a service provider's charge. These variations may result from individual service provider/customer agreements, or from wider market offerings such as volume discounts and calling plans.

**Dropped Call**

A customer call which has terminated due to network failure

**Net due for payment**

The total amount on a bill which the customer is due to pay from current billing charges

**Regular type**

The black or dark colour text printed on light paper

**Reversed type**

Light coloured text printed on dark paper

**Service provider**

A carrier or carriage service provider who is providing the telecommunications product or service to the customer and has entered into a contractual arrangement with the customer

**Tariff**

A statement by the service provider that sets out the services offered by that company and the rates, terms and conditions for the use of those services

**Telephone Allowance**

The contribution to payment of bill charges made, as part of the Household Benefits package, by the Department of Social and Family Affairs on behalf of eligible customers

**Third Party**

Any organisation or individual other than the service provider

**UAN - Universal Account Number**

The UAN is a unique identifier utilised by service providers in the context of retail services and is printed on the customer's bill. It allows customers to initiate a switch between service providers.

**VAT - Value Added Tax**