

Executive Agency for Health and Consumers

**CONSUMER MARKET STUDY ON THE FUNCTIONING  
OF THE MARKET FOR INTERNET ACCESS AND  
PROVISION FROM A CONSUMER PERSPECTIVE**

Final Report

**Part 3: Website Evaluation and Switching Exercise**

<i>Title</i>	Consumer market study on the functioning of the market for Internet access and provision from a consumer perspective
<i>Conducted for</i>	Executive Agency for Health and Consumers
<i>Prepared by</i>	Civic Consulting
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# 1 INTRODUCTION

***The Executive Agency for Health and Consumers (hereafter “the Agency”), acting on behalf of the European Commission (DG SANCO, Directorate Consumer Affairs), has commissioned a consumer market study on the functioning of the market for Internet access and provision from a consumer perspective to Civic Consulting, lead Contractor of the Consumer Market Studies Consortium (CMSC).***

Part 3 of the study presents the results of the evaluation of comparison websites and Internet service provider websites as well as the switching exercise.

The switching exercise was implemented through collaboration with national implementation partners (consumer organisations) located in Bulgaria, Germany, Poland, Spain, Sweden and the United Kingdom, on the basis of a methodology developed by Civic Consulting.

## ***Disclaimer***

This report was produced under the Consumer Programme (2007-2013) in the frame of a contract with the Executive Agency for Health and Consumers (EAHC) acting on behalf of the European Commission. The content of this report represents the views of Civic Consulting and is its sole responsibility; it can in no way be taken to reflect the views of the European Commission and/or EAHC or any other body of the European Union. The European Commission and/or EAHC do not guarantee the accuracy of the data included in this report, nor do they accept responsibility for any use made by third parties thereof.

## 2 EVALUATION OF COMPARISON AND PROVIDER WEBSITES

***This section of the report presents the results of the evaluation of comparison websites and Internet service provider websites. It also describes the methodology used for the implementation of this exercise.***

### 2.1 METHODOLOGY FOR IMPLEMENTATION

#### *Definition of products and initial testing of methodology (Pre-trials)*

Product definitions for the evaluation of comparison websites and Internet service provider websites (with regard to Internet service provision products) were developed on the basis of interviews and the evaluation of available research and data. During a large number of pre-trials we tested the suitability of these products, and we explored how ISPs' offers are presented, both on ISPs' websites and on comparison websites across Europe. The pre-trials covered comparison websites from 14 countries and selected ISPs' websites. The set of five ISP products that was used in the exercise to test price comparison websites was finalised on the basis of the results of the pre-trials.

The selected products were:

- ▶ Standalone Internet with a speed of up to 12Mbps;
- ▶ 'Double-play' Internet (broadband Internet and fixed telephony) with a speed of up to 12Mbps;
- ▶ 'Double-play' Internet (broadband Internet and fixed telephony) with a speed of between 12Mbps and 30Mbps;
- ▶ 'Triple-play' Internet (broadband Internet and fixed telephony and TV) with a speed of between 12Mbps and 30Mbps; and
- ▶ 'Triple-play' Internet (broadband Internet and fixed telephony and TV) with a speed of more than 30Mbps.

#### *Testing comparison websites and identification of choice and lowest price in 6 locations*

To prepare the evaluation of the websites, we collected information on price comparison websites from a variety of web indices and directories, including DMOZ and websites listed by BEREC. We then supplemented this list with Google searches for "price comparison", "online price comparison", "comparison website", and "switching", combined with the terms "Internet service provision" or "broadband". For this identification of comparison websites, we used Google's translation function for translating the search terms from English into the destination language and the

resulting web pages from their native language into English. Using Google's translation feature, we verified that all identified websites are in fact functional comparison websites by searching for offers.

In cases where we identified more than five functioning comparison websites per country, we gathered global traffic ranking results from Alexa<sup>1</sup> (making sure that the CW of the national regulatory authority is included, if applicable), to allow for identification of the five most used sites for each country for inclusion in the evaluation, and we also considered the functionality of the comparison websites for the selection (e.g. websites that allow mystery shoppers to include search criteria such as location were preferred). In the countries for which five CWs could not be identified, we tested the comparison websites that were available and then continued the exercise with a direct review of ISPs' offers.

Mystery shoppers (one per Member State, plus Iceland and Norway)<sup>2</sup> replicated the consumer experience with comparison websites (CWs) that allow for the comparison of broadband Internet access offers and related bundles in all 29 study countries. First, they assessed the comparison websites regarding contact information and business practices provided to consumers. Then they searched for each of the five specified products and collected price information about the offer of the incumbent and the lowest price offer. If the CW provided a link to the lowest price offer on the ISP website, the mystery shoppers clicked on it and assessed the consistency between comparison websites and ISP websites. Finally, mystery shoppers assessed the overall functioning of the comparison websites tested by using the following six criteria: user-friendliness of the CW; ease of comparison of the prices of different offers listed on the CW; ease of comparison of technical aspects of different offers listed on the CW; coverage of offers from different Internet providers; accuracy of the information provided on the CW; overall assessment of usefulness of CW.

If several prices were listed for each of the offers in question, such as an introductory monthly price that is valid for a certain period and a standard monthly price (which is valid after this period), the offer with the lowest standard monthly price was selected. If the comparison website offered average prices including one-off costs, these were used as the basis to identify the cheapest offer. In case two offers matched the product description and were identical in price, the most advantageous offer, for example with a higher download speed, was chosen.

This test was conducted with up to three popular comparison websites that allow for search by location (defined by a post code, address and phone number of an existing

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<sup>1</sup> Alexa Traffic Rank is a global ranking of websites. The traffic rank is based on three months of aggregated historical traffic data from millions of Alexa Toolbar users and data obtained from other, diverse traffic data sources, and is a combined measure of page views and users (reach). See: <http://www.alexa.com/help/traffic-learn-more>.

<sup>2</sup> Mystery shoppers were native speakers of the relevant language(s) or fluent at a native speaker level. They were younger and better educated, mainly students, but also persons with professional backgrounds. They were all fluent in English and Internet-savvy, to ensure that assessments of the comparison websites were not distorted by a person's inexperience with the Internet.

person/house). The search was conducted for six locations in the country, including the capital city and five additional randomly chosen locations in the country (for another large city, two medium sized cities and two rural locations). In addition, we checked two comparison websites that do not allow users to search by location in order to assess the full spectrum of search possibilities. In cases where less than three comparison websites allowing for search by location were available in the country, we included additional simple comparison websites that do not allow search by location in the test in order to safeguard that five comparison websites are covered (to the extent that they are available in a given country).

As part of the check of ISP websites, mystery shoppers assessed one offer for each of the assessed ISPs. Clarity and understandability of the offer was assessed by mystery shoppers on the basis of a pre-defined set of criteria, including the provision of information on technical aspects, price, contract duration, customer service and additional online services. Finally they assessed the ISPs on the ease of access to this information and overall clarity of offer information.

## 2.2 RESULTS OF FIELDWORK

This section summarises the results of the evaluation of the comparison and provider websites. It focuses first on the comparison websites (CWs), before presenting information regarding the websites of Internet service providers (ISPs).

### 2.2.1 Comparison websites

The website evaluation exercise was designed to evaluate up to five CWs per country. In three cases this number was extended to six as a result of specific circumstances.<sup>3</sup> However, due to the relative or complete absence of relevant CWs in many of the 29 countries studied, the total number of CWs evaluated was 81. The following figure provides a by-country breakdown of the distribution of CWs evaluated during the exercise.<sup>4</sup>

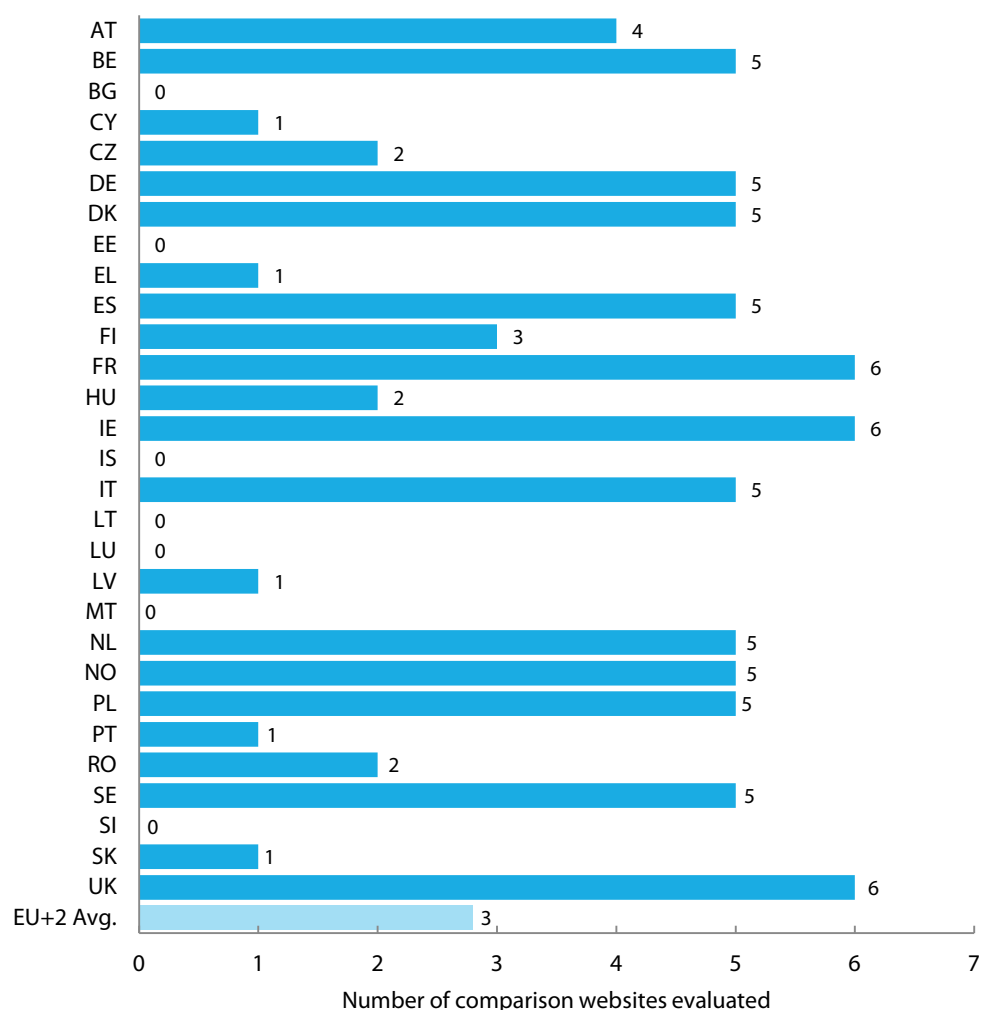
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<sup>3</sup> The three countries are France, Ireland, and the UK. In the case of France, a sixth comparison website was evaluated because one of the initial five blocked the mystery shopper's product/location searches at a certain point. In Ireland and the United Kingdom, during the course of the exercise additional comparison websites, which were of particular interest (e.g. they were accredited by national regulatory authorities) were identified and included in the exercise.

<sup>4</sup> Following the mystery shopping exercise, a relevant comparison website in Estonia was identified (<http://pk.konkurentsiamet.ee/>) which could consequently not be included in the exercise (and this resulting figure).

**Figure 1.** Please indicate the country for which you are conducting the website evaluation

Source: Civic Consulting website evaluation, Question CW2. (N=81)



As the figure shows, there was significant variation in the number of CWs assessed per country. In some countries we were unable to identify any CWs, neither through pre-exercise desk research nor through additional searches conducted by the mystery shoppers in the primary language of the country. Conversely, CWs were plentiful in France, Ireland, and the UK, and six CWs were assessed in each of these countries. In a further nine countries, five CWs were assessed (Belgium, Germany, Denmark, Spain, Italy, the Netherlands, Norway, Poland and Sweden). On average, approximately three CWs were assessed per country.

The full list of evaluated comparison websites is presented in the following table.



**Table 1.**  
**Comparison**  
**websites evaluated**

Note: (a) The link used during the comparison website evaluation exercise no longer functions.

Country	Name of comparison website	Link to website
AT	Tarife Check - Österreichs führender Tarifvergleich	<a href="http://www.tarifcheck.at">www.tarifcheck.at</a>
	Geizhals Preisvergleich	<a href="http://geizhals.at/isp/">http://geizhals.at/isp/</a>
	Ihr Internet-Tarifrechner	<a href="http://www1.arbeiterkammer.at/Internetprovider/">www1.arbeiterkammer.at/Internetprovider/</a>
	Providerliste - Vergleichen & Sparen	<a href="http://www.providerliste.at/adsl.html">http://www.providerliste.at/adsl.html</a>
BE	Astel.be	<a href="http://www.astel.be/comparastel">http://www.astel.be/comparastel</a>
	Mesfournisseurs.be	<a href="http://www.mesfournisseurs.be/">http://www.mesfournisseurs.be/</a>
	Speed.be	<a href="http://www.speed.be">http://www.speed.be</a>
	Comparatio	<a href="http://www.comparatio.be/nl/vergelijk/internet">http://www.comparatio.be/nl/vergelijk/internet</a>
	Vergelijk.be	<a href="http://www.vergelijk.be/">http://www.vergelijk.be/</a>
CY	Cyprus Broadband	<a href="http://www.cyprusbroadband.net/">http://www.cyprusbroadband.net/</a>
CZ	DSL.cz - Nabídky připojení DSL	<a href="http://www.dsl.cz/">http://www.dsl.cz/</a>
	Lupa.cz	<a href="http://www.lupa.cz/pripojeni/">http://www.lupa.cz/pripojeni/</a>
DE	Teltarif.de	<a href="http://www.teltarif.de/internet/">http://www.teltarif.de/internet/</a>
	Verivox	<a href="http://www.verivox.de/internet/dsl-tarifrechner.aspx">http://www.verivox.de/internet/dsl-tarifrechner.aspx</a>
	Check24	<a href="http://www.check24.de/dsl-handy/">http://www.check24.de/dsl-handy/</a>
	Billig-Tarife.de	<a href="http://www.billig-tarife.de/">http://www.billig-tarife.de/</a>
	DSLWEB	<a href="http://www.dslweb.de/dsl-vergleich.php">http://www.dslweb.de/dsl-vergleich.php</a>
DK	INTERNETpriser	<a href="http://www.internetpriser.dk/">http://www.internetpriser.dk/</a>
	IT- og Telestyrelsen	<a href="http://borger.itst.dk/verktøjer/teleguide/internetsearch/internetcablesearch?ui=b">http://borger.itst.dk/verktøjer/teleguide/internetsearch/internetcablesearch?ui=b</a>
	Pristjekket	<a href="http://www.pristjekket.dk/internet/">http://www.pristjekket.dk/internet/</a>
	Telemarkedet.dk	<a href="http://www.telemarkedet.dk/bredbaand/prissammenligning">http://www.telemarkedet.dk/bredbaand/prissammenligning</a>
	TelePristjek.dk	<a href="http://telepristjek.dk/bredbaand/internet/priser.aspx">http://telepristjek.dk/bredbaand/internet/priser.aspx</a>
EL	Lost in Market	<a href="http://lostinmarket.gr/broadband/broadband.php(a)">http://lostinmarket.gr/broadband/broadband.php(a)</a>
ES	MyBestOption	<a href="http://www.mybestoption.es/Adsl">http://www.mybestoption.es/Adsl</a>
	Asesor ADSL	<a href="http://www.asesoradsl.com">http://www.asesoradsl.com</a>
	ADSL Net	<a href="http://www.adslnet.es/">http://www.adslnet.es/</a>
	Dos Yogures	<a href="http://www.dosyogures.es/adsl/tarifas(a)">http://www.dosyogures.es/adsl/tarifas(a)</a>
	Banda Ancha	<a href="http://bandaancha.eu/comparativa/adsl-telefono">http://bandaancha.eu/comparativa/adsl-telefono</a>
FI	Viestintävirasto	<a href="http://www.viestintavirasto.fi/index/internet/laajakaista/laajakaistapalveluidenhintavertailu/kiintealaajakaistat.html">http://www.viestintavirasto.fi/index/internet/laajakaista/laajakaistapalveluidenhintavertailu/kiintealaajakaistat.html</a>
	Laajakaistavertailu.fi	<a href="http://www.laajakaistavertailu.fi/">http://www.laajakaistavertailu.fi/</a>
	Laajakaista.tv	<a href="http://www.laajakaista.tv/">http://www.laajakaista.tv/</a>
FR	DSLvalley	<a href="http://www.dslvalley.com/adsl/">http://www.dslvalley.com/adsl/</a>
	Ariase.com	<a href="http://www.ariase.com/fr/comparatifs/index.html">www.ariase.com/fr/comparatifs/index.html</a>
	Edcom	<a href="http://www.edcom.fr/comparateur-adsl.html">http://www.edcom.fr/comparateur-adsl.html</a>
	Comparatif ADSL	<a href="http://www.comparatifadsl.net/comparatif-adsl.php">www.comparatifadsl.net/comparatif-adsl.php</a>
	Kelkoo	<a href="http://www.kelkoo.fr/c-100015713-abonnement-adsl.html">http://www.kelkoo.fr/c-100015713-abonnement-adsl.html</a>

	Offres Internet Haut Débit	<a href="http://www.offres-internet-haut-debit.com/">http://www.offres-internet-haut-debit.com/</a>
<b>HU</b>	Tantusz	<a href="http://www.tantusz.nhh.hu">www.tantusz.nhh.hu</a>
<b>HU</b>	Valtsvelünk	<a href="http://www.valtsvelunk.hu/">http://www.valtsvelunk.hu/</a>
<b>IE</b>	Uchoose.ie	<a href="http://www.uchoose.ie/compare-broadband">www.uchoose.ie/compare-broadband</a>
	Bonkers.ie	<a href="http://www.bonkers.ie/compare-broadband">www.bonkers.ie/compare-broadband</a>
	TrySwitch	<a href="http://www.tryswitch.ie">www.tryswitch.ie</a>
	Freetocompare.ie	<a href="http://freetocompare.ie">http://freetocompare.ie</a>
	Compare Ireland	<a href="http://www.compareireland.ie">http://www.compareireland.ie</a>
	Callcosts.ie	<a href="http://www.callcosts.ie">http://www.callcosts.ie</a>
<b>IT</b>	S0Stariffe	<a href="http://www.sostariffe.it/confronto-offerte-adsl/">http://www.sostariffe.it/confronto-offerte-adsl/</a>
	MyBestOption	<a href="http://www.mybestoption.it/adsl_it">www.mybestoption.it/adsl_it</a>
	SuperMoney	<a href="http://telefonia.supermoney.eu/internet-adsl/">http://telefonia.supermoney.eu/internet-adsl/</a>
	Tomshopper	<a href="http://www.tomshopper.it/adsl.php">http://www.tomshopper.it/adsl.php</a>
	Confronta ADSL	<a href="http://www.confronta-adsl.com/comparatore/">http://www.confronta-adsl.com/comparatore/</a>
<b>LV</b>	Gudriem.lv	<a href="http://www.gudriem.lv/internets?lng=lv">http://www.gudriem.lv/internets?lng=lv</a>
<b>NL</b>	Vergelijk.nl	<a href="http://www.vergelijk.nl/adsl/">http://www.vergelijk.nl/adsl/</a>
	PrizeWize	<a href="http://www.prizewize.nl/internet/internet-vergelijken/">http://www.prizewize.nl/internet/internet-vergelijken/</a>
	Overstappen.nl	<a href="http://www.overstappen.nl/internet/">http://www.overstappen.nl/internet/</a>
	Internetvergelijken.com	<a href="http://www.internetvergelijken.com/">http://www.internetvergelijken.com/</a>
	Internet Providers Vergelijken	<a href="http://www.internetprovidersvergelijken.nl/">http://www.internetprovidersvergelijken.nl/</a>
<b>NO</b>	NyttBredbånd	<a href="http://www.nyttbredband.no/">http://www.nyttbredband.no/</a>
	Telepriser.no	<a href="http://www.telepriser.no">www.telepriser.no</a>
	Billigbredband.no	<a href="http://www.billigbredband.no/">http://www.billigbredband.no/</a>
	DinSide	<a href="http://www.dinside.no/105020/artikkel">http://www.dinside.no/105020/artikkel</a>
	Kortogkontant	<a href="http://www.kortogkontant.no/telepriser/bredbandadsl">http://www.kortogkontant.no/telepriser/bredbandadsl</a>
<b>PL</b>	Dostawcy-internetu.pl	<a href="http://www.dostawcy-internetu.pl/porownaj-ceny-internetu">http://www.dostawcy-internetu.pl/porownaj-ceny-internetu</a>
	Wybieramy.net	<a href="http://www.wybieramy.net/">http://www.wybieramy.net/</a>
	TotalMoney.pl	<a href="http://totalmoney.dziennik.pl/internet/porownanie">http://totalmoney.dziennik.pl/internet/porownanie</a>
	Plaćę Mniej	<a href="http://www.placemniej.pl/internet/oferty_dla_domu.html">http://www.placemniej.pl/internet/oferty_dla_domu.html</a>
	Niskirachunek.pl	<a href="http://internet.niskirachunek.pl/(a)">http://internet.niskirachunek.pl/(a)</a>
	Anacom	<a href="http://www.anacom.pt/tarifarios/Paginalnicial.do">http://www.anacom.pt/tarifarios/Paginalnicial.do</a>
<b>RO</b>	Moneycenter.ro	<a href="http://www.moneycenter.ro/comparatii/abonamente-internet.html">http://www.moneycenter.ro/comparatii/abonamente-internet.html</a>
	Costo	<a href="http://www.costo.ro/internet/">http://www.costo.ro/internet/</a>
<b>SE</b>	Prisjakt	<a href="http://www.prisjakt.nu/">http://www.prisjakt.nu/</a>
	PriceRunner	<a href="http://www.pricerunner.se">www.pricerunner.se</a>
	Telepriskollen.se	<a href="http://www.telepriskollen.se/(a)">http://www.telepriskollen.se/(a)</a>
	Compricer.se	<a href="http://www.compricer.se">www.compricer.se</a>
	Prisfakta	<a href="http://bredband.prisfakta.se/jamfor.php?sort=typ">http://bredband.prisfakta.se/jamfor.php?sort=typ</a>

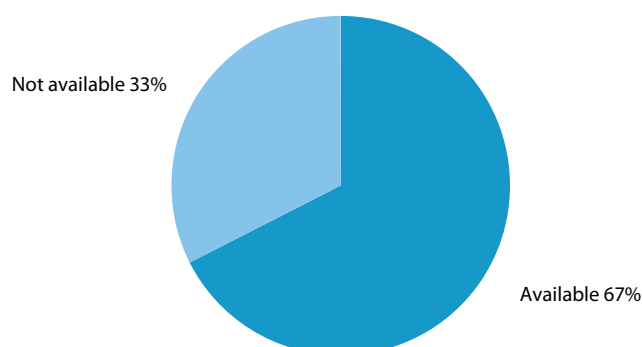
<b>SK</b>	Porovnat.sk	<a href="http://www.porovnat.sk/">http://www.porovnat.sk/</a>
<b>UK</b>	Uswitch	<a href="http://www.uswitch.com">www.uswitch.com</a>
	Compare the Market	<a href="http://www.comparethemarket.com/broadband">www.comparethemarket.com/broadband</a>
	MoneySupermarket	<a href="http://www.moneysupermarket.com/broadband/">http://www.moneysupermarket.com/broadband/</a>
	Broadband Expert	<a href="http://www.broadband-expert.co.uk/">http://www.broadband-expert.co.uk/</a>
	Compare Broadband Packages	<a href="http://www.comparebroadbandpackages.co.uk/">http://www.comparebroadbandpackages.co.uk/</a>
	Broadband Choices	<a href="http://www.broadbandchoices.co.uk/">http://www.broadbandchoices.co.uk/</a>

### **Availability of basic business information on comparison websites**

Mystery shoppers were asked whether they could find several pieces of contact- or registration-related information (i.e. business address, email address, telephone number and VAT or registration number) on the websites of the comparison websites they evaluated. The results for all of the CWs evaluated are summarised below.

**Figure 2.** *Is the following information about the CW available on the website? [Business address]*

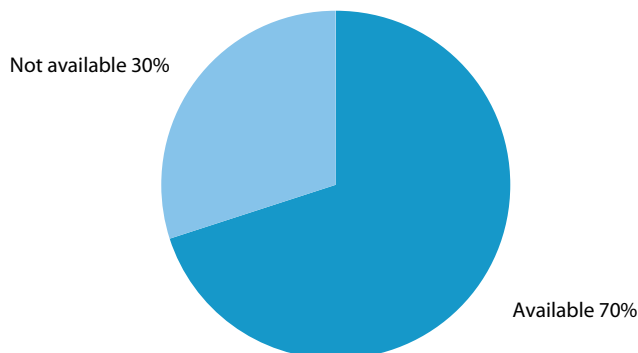
Source: Civic Consulting website evaluation, Question CW8. (N=80)



Two-thirds (67%) of the CWs evaluated in the exercise provided a business address on one of their webpages, while on one-third (33%) of CWs mystery shoppers could not find a business address.

**Figure 3.** Is the following information about the CW available on the website? [Email address]

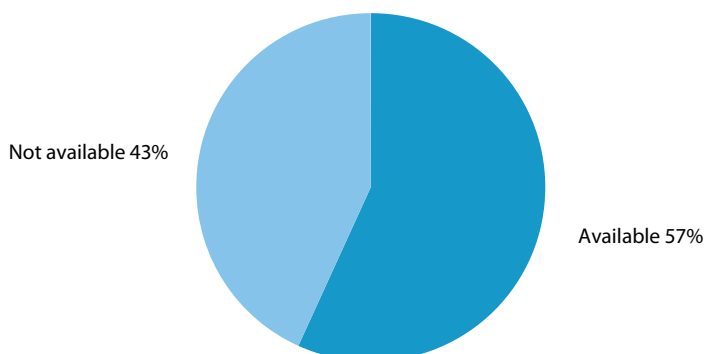
Source: Civic Consulting website evaluation, Question CW9. (N=80)



Slightly more than two-thirds (70%) of CWs offered an email address through which they could be contacted by consumers. On the other 30% of CWs the mystery shoppers could not find an email address.

**Figure 4.** Is the following information about the CW available on the website? [Telephone number]

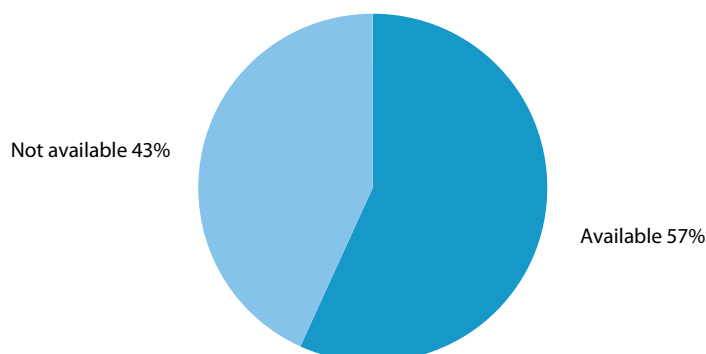
Source: Civic Consulting website evaluation, Question CW10. (N=81)



Just over half of CWs (57%) provided a telephone number on which they could be contacted by consumers. However, 43% of CWs did not list a telephone number.

**Figure 5.** *Is the following information about the CW available on the website? [VAT or registration number]*

Source: Civic Consulting website evaluation, Question CW11. (N=81)



On 57% of CWs the mystery shoppers were able to find a VAT number or a company registration number. On 43% of CWs neither of these items could be found, though this figure includes those CWs administered by a national regulator or other public authority.<sup>5</sup>

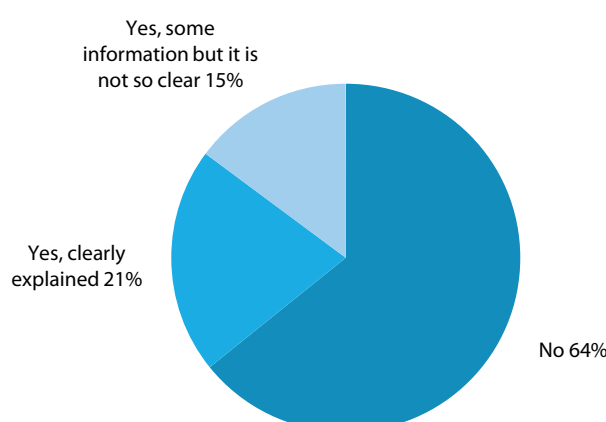
#### **Business and commercial practices of comparison websites**

In this exercise, almost two thirds of CWs (64%) provided no explanation for why some offers were listed and others not. While 36% of CWs offered some information, in many cases this was considered by the mystery shoppers to be unclear, with the result that only 21% of CWs gave an explanation for the listing of ISPs that was considered clear by mystery shoppers.

<sup>5</sup> Excluding the eight publically-administered CWs from the VAT/registration number results slightly alters them such that the percentage of CWs displaying VAT or registration numbers increases to 62%.

**Figure 6.** Does the CW clearly explain to the consumer why certain ISPs and their offers are listed and not others?

Source: Civic Consulting website evaluation, Question CW12. (N=81)



Of those CWs which did give an explanation for the listing or non-listing of ISPs, some claimed to list all ISPs that were operating in the country, such as one website in the Czech Republic, which stated that it monitors all DSL providers in the country every day, so that it offers all current promotions. A couple of websites stressed that all ISPs had the opportunity to be listed, if they so wished. If there were gaps in the CW's coverage of the market this was mainly due to the lack of interest of the ISPs, according to these websites.

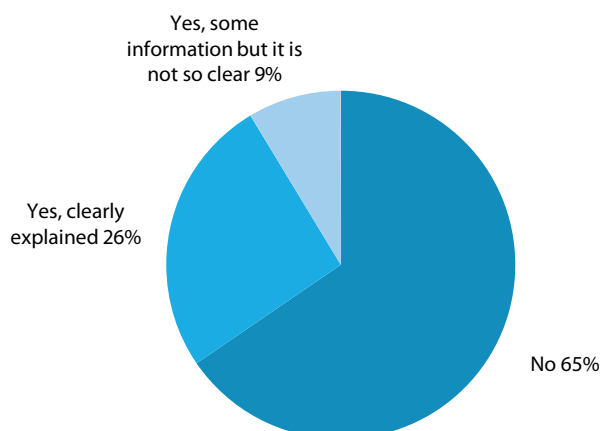
A few CWs explained that a fee was sometimes paid by the ISPs to be listed. However, most of these CWs stated that they still listed offers from ISPs that had not paid a fee. One Swedish CW explained that ISPs that paid a fee would receive 'expanded listings', which included the display of their logo and a direct link to the ISP website.

One French CW made it clear that only ISPs that had paid a fee would be included in their listings.

Apart from a supplier's lack of interest or failure to pay a fee, various other reasons were listed on the CWs which might lead to an ISP not being listed. One Dutch website, for example, required that ISPs should cover at least 5% of the market, if they wished to be included on their website. One Norwegian CW stipulated that ISPs meet the requirements of the Electronic Communications Act and Ecom Regulations, participate in the Consumer Complaints Board for electronic communications, have terms that govern consumers' rights and obligations for use of the service and operate an independent and efficient customer service. Another Norwegian CW explained that it only listed offers from ISPs that cover the whole country, rather than just specific regions.

**Figure 7.** *Is there a clear explanation of the default ranking of search results (the view that appears first)?*

Source: Civic Consulting website evaluation, Question CW14. (N=81)



Mystery shoppers were asked to look for an explanation of the default ranking of search results. Almost two-thirds of CWs (65%) did not give an explanation. In 35% of cases there was some explanation provided, but 9% of CWs gave an unclear explanation of the default ranking, meaning only a quarter of CWs (26%) offered information that was considered by the mystery shoppers to be clear.

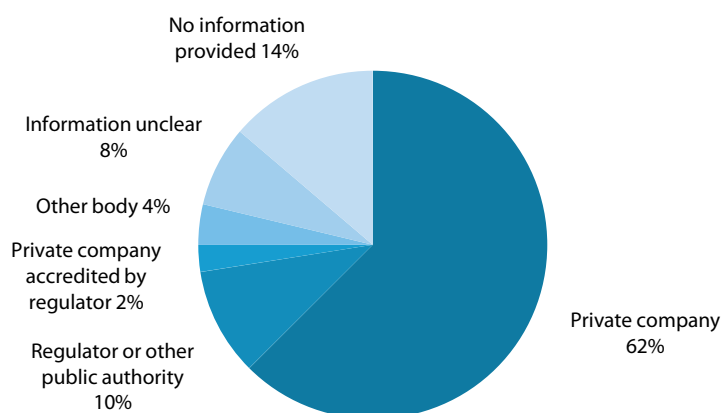
Where information about default ranking of results was provided, the most common explanation given was that the ranking was based on price, with the lowest price appearing first. Some websites specified the price information used for the ranking, such as average monthly price or total first year cost. One Greek website explained that it based the ranking on customer reviews, while one Belgian website explained that the ranking was based on their own assessments of customer service quality.

In their explanation for the default ranking of search results a few CWs declared that no particular ISPs would receive preferential treatment and that payment of a fee could not affect the ranking.

Only one French website made it clear that the default ranking of ISPs would be determined by the fee that they had paid.

**Figure 8.** *Is the CW run by a private company, a regulator or an NGO?*

Source: Civic Consulting website evaluation, Question CW15. (N=80)

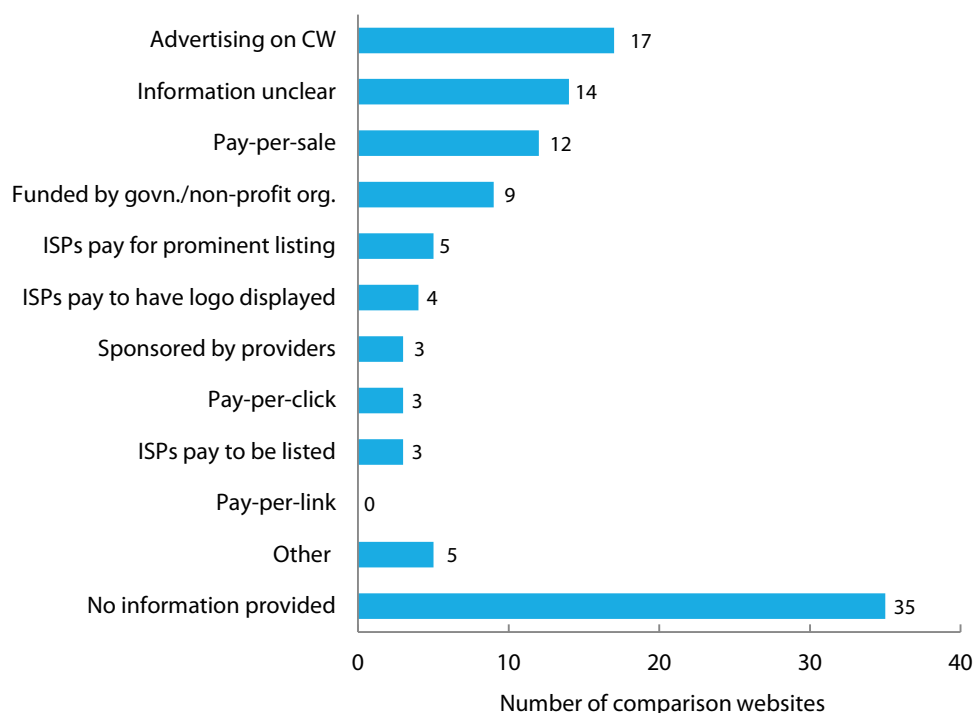


Most CWs (86%) provided some explanation of whether they were run by a private company, a regulator or an NGO, although in some of these cases the information was considered by the mystery shoppers to be unclear (8% of total). Of those CWs that provided a clear explanation, the vast majority (62% of total sample) were run by a private company. A further 10% of CWs were run by a regulator or other public authority, while another 2% were private companies that were accredited by a regulator. In 4% of cases some other type of body administered the CW: one explained that it was administered by a joint-stock company, one that it was run by a private person or group of persons and one that it was run 'independently'.



**Figure 9.** Specify the sources of the CW's revenue as indicated on the website (mark all that apply).

Source: Civic Consulting website evaluation, Question CW16. (N=81)

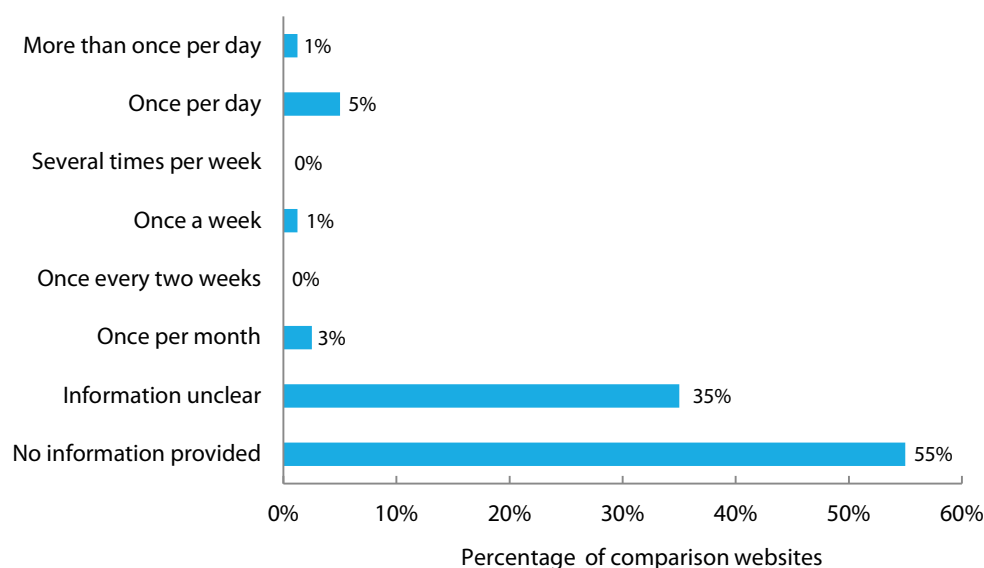


Of the 81 CWs included in the website evaluation a total of 35 were reported to provide no information about their sources of revenue. The most common source of revenue indicated was advertising (17 CWs), followed by pay-per-sale (12 CWs). Other sources of revenue were payment from ISPs for prominent listing (5 CWs), payment from ISPs to have their logo displayed (4 CWs), sponsorship by providers (3 CWs), pay-per-click (3 CWs) and payment from ISPs to be listed at all (3 CWs). A further 9 CWs received funding from a government or not-for-profit organisation. Many CWs had multiple sources of revenue.

However, 14 CWs provided information on their sources of revenue that was assessed by the mystery shoppers as unclear. For example, some of these provided information for business customers about the possibility of advertising on the CW but gave no explanation for consumers of their sources of revenue. Some CWs indicated that they receive payment from ISPs but it was not clear on what basis this was arranged (i.e. pay-per-click, pay-per-sale, etc.). Five CWs had sources of revenue classified by mystery shoppers as other. For example, one of these explained that it was funded by its owners.

**Figure 10.** How frequently are offers listed on the CW updated, according to the information provided?

Source: Civic Consulting website evaluation, Question CW17. (N=80)

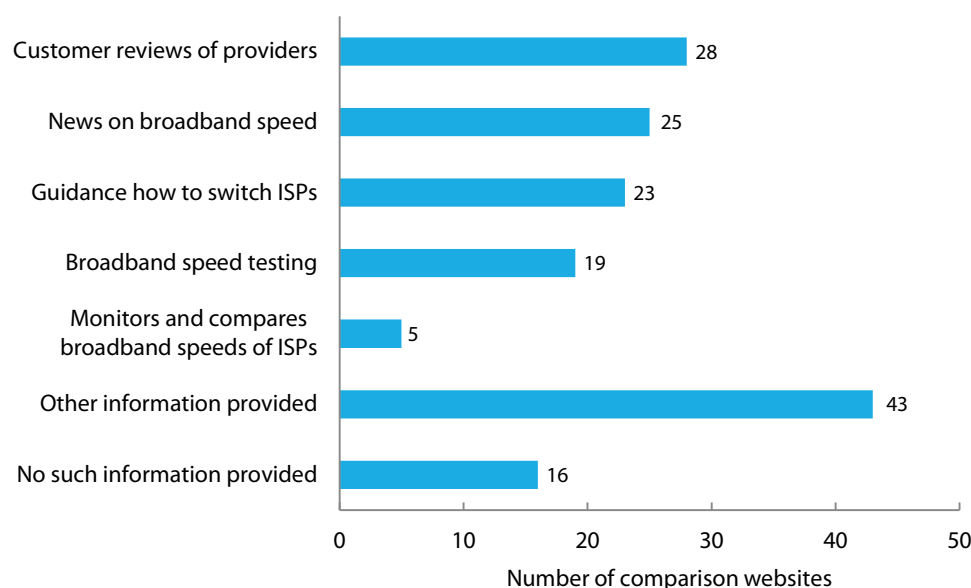


Only 10% of CWs gave clear information about the frequency with which offers were updated. The most common explanation was that offers were updated daily (5%). Another 3% of CWs claimed to update offers on a monthly basis. A few CWs explained that offers were checked once a week (1%) or more than once per day (1%). However, this information is not necessarily representative as more than half of the CWs (55%) provided no explanation of how often offers were updated.

In around a third of cases (35%) the CWs provided information that was unclear. From the comments recorded by mystery shoppers it is clear that in more than a third of these CWs explained that offers were updated ‘regularly’, ‘frequently’, ‘constantly’, etc. One quarter displayed the last day on which offers were checked. In two-thirds of these cases the offers had been updated at some point within the previous two weeks. In one-third of cases the date given as the last update was the day of the evaluation itself. However, on one website the offers had not been updated for more than three months.

**Figure 11.** Does the CW provide general information on broadband services and assessments of ISPs' service quality that help consumers choosing a provider?

Source: Civic Consulting website evaluation, Question CW27. (N=81)

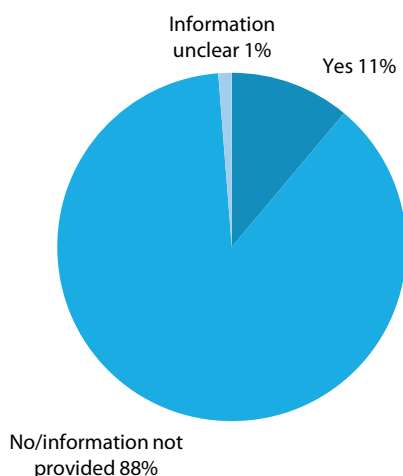


Most CWs provided the consumer with some type of general information on broadband services. Only 16 CWs offered no such information. The most common type of information available was customer reviews of providers (28 CWs), followed by news on broadband speed (25 CWs), guidance on how to switch ISPs (23 CWs) and broadband speed testing (19 CWs). Certain websites also monitored and compared the broadband speed of ISPs (5 CWs).

Just over half of the websites (43 CWs) offered information that was classified as other. In these cases the mystery shoppers recorded in the comments section what type of information was provided. Their comments show that 3 CWs provided a consumer forum, where consumers could discuss broadband-related issues. More frequently, CWs provided guides to various aspects of broadband service, such as how to choose a supplier or how to understand the contract terms (with explanations of phrases such as 'download limit' or 'fair usage policy') (21 CWs). Some CWs offered detailed information on specific providers and the technical aspects of their offers (12 CWs). Others provided general broadband news, for example about the latest developments in broadband technology (6 CWs).

**Figure 12.** Does the CW belong to an accreditation scheme?

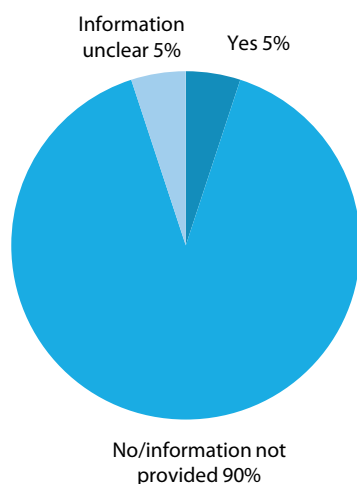
Source: Civic Consulting website evaluation, Question CW18. (N=81)



Only in a limited number of cases, did CWs state that they belong to an accreditation scheme. Accreditation schemes mentioned by mystery shoppers in their comments include the Excellence Ireland Quality Association, AGCOM, and Ofcom.

**Figure 13.** Does the CW belong to an industry code of conduct?

Source: Civic Consulting website evaluation, Question CW21. (N=79)



According to mystery shoppers, only 5% of CWs stated that they belonged to an industry code of conduct.

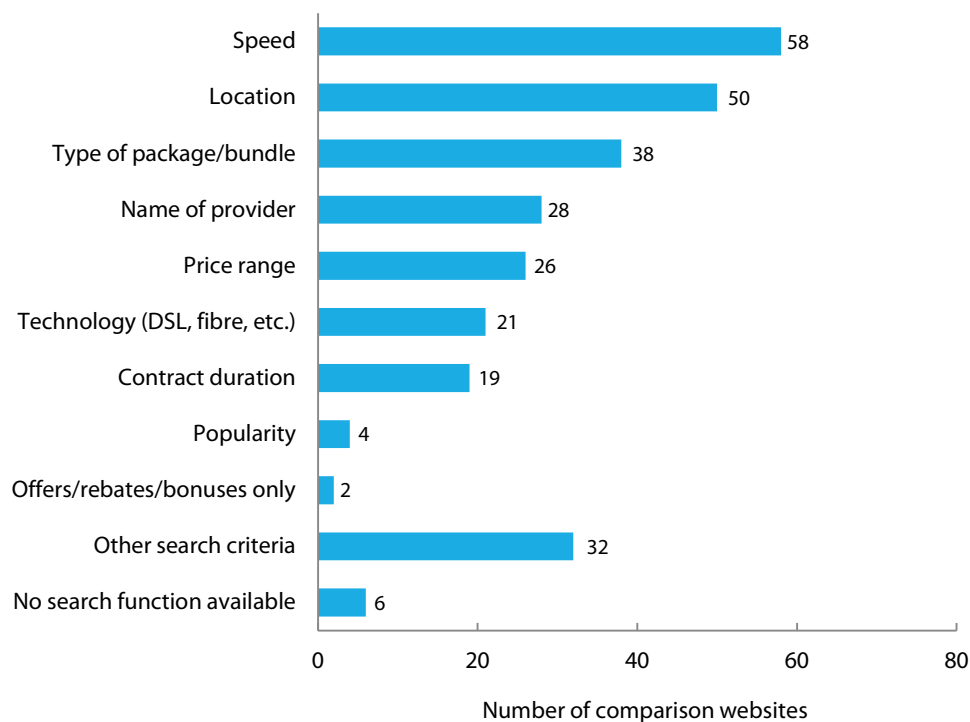
**Search functions on comparison websites**

Mystery shoppers were asked to indicate the criteria that were available for searching on the CWs. Only 6 CWs failed to provide any criteria for searching the listings, while many CWs provided multiple search possibilities. The most common search criteria

provided was speed, which was available on 58 CWs, followed by location (50 CWs),<sup>6</sup> type of package/bundle (38 CWs), name of provider (28 CWs), price range (26 CWs), type of technology (21 CWs) and contract duration (19 CWs). On 4 CWs it was also possible to search by popularity and on 2 CWs by only those products that came with offers, rebates or bonuses.

**Figure 14.** According to which criteria is it possible to search for offers (please select all that apply)?

Source: Civic Consulting website evaluation, Question CW24. (N=81)

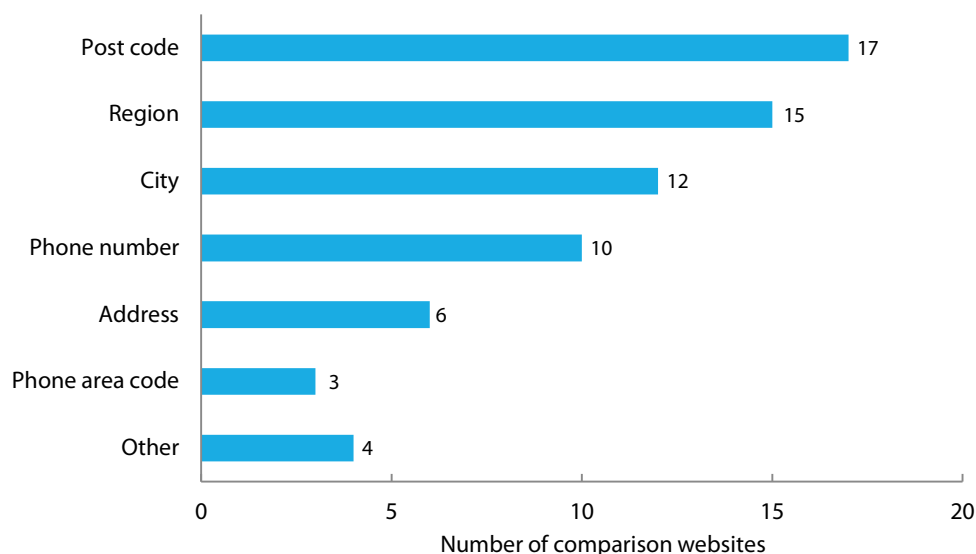


On 32 CWs mystery shoppers came across search criteria that they categorised as other. These were further explained by some mystery shoppers in their written comments. These comments show that it was most frequently possible to search for offers with a particular download limit (12 CWs). On 5 CWs it was possible for mystery shoppers to search for particular phone tariffs for double play bundles (e.g. flat rate, free evening and weekend calls) and on 2 CWs to search for triple play bundles that included particular TV channels. On 5 CWs it was also possible to search for products which came with particular extra features (such as static IP, email, antivirus protection, etc.), while on 2 CWs it was possible to narrow down search results based on the various payment options that were available (e.g. length of billing period, type of payment).

<sup>6</sup> The generalisation of these figures should be avoided, as comparison websites allowing search by location were preferred in the selection of websites to be evaluated in this study.

**Figure 15.** What possibilities are there to check availability by location (please select all that apply)?

Source: Civic Consulting website evaluation, Question CW25. (N=50)

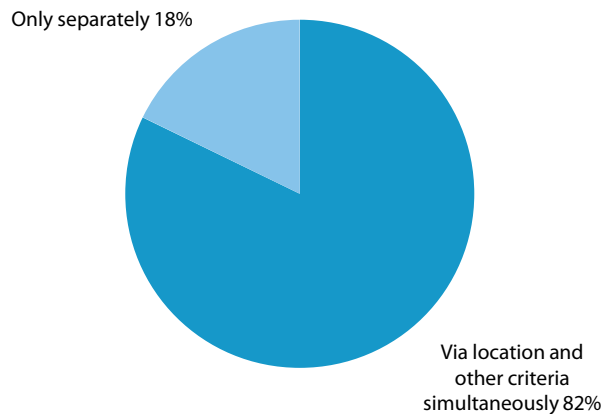


Mystery shoppers were asked to record the available methods to search by location on the CWs. Some CWs provided multiple options to search by location, but most CWs offered only one option. The most common method was post code (17 CWs), followed by region (15 CWs), city (12 CWs), phone number (10 CWs), full address (6 CWs) and phone area code (3CWs). On 4 CWs the mystery shoppers recorded a location search factor that was categorised as other. From the comments recorded by mystery shoppers it is clear that these included street name, farm number and municipality.<sup>7</sup>

<sup>7</sup> In total, with 38 of these was it possible to search at city level or lower. On the remaining 12 CWs it was only possible to search using less specific location criteria, such as region.

**Figure 16.** *If search by location and search by one or more other criteria are indicated in Question 24 above: Is it possible to search via location and other criteria simultaneously, or only separately?*

Source: Civic Consulting website evaluation, Question CW26.  
(N=45)



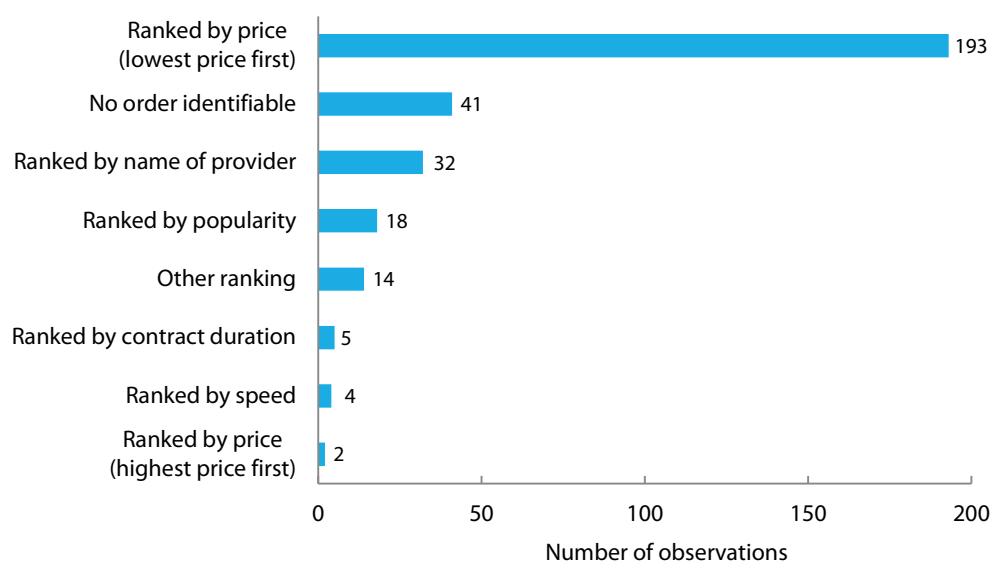
On four-fifths (82%) of CWs which offered a location search function, as well as another type of search function, it was possible to search by location and the other criteria(s) (such as speed, price, etc.) simultaneously. On the remaining 18% of CWs with a location search function and another search type it was only possible to search by location and the other criteria(s) separately.

**Presentation of offers on comparison websites**

After assessing the provision of general information on comparison websites (i.e. contact information, business and commercial practices, and search functionality), mystery shoppers searched for each of the five pre-specified products, using the search-by-location feature – if available – to search in each of six locations. The manner in which the results of these product searches were provided on the various CWs and whether that presentation matched the details shown on the associated offer pages on ISP websites is discussed in this sub-section. Due to the approach described, the sample size is expanded in this section. The figures below reflect the findings of each of the five product searches conducted on each CW.

**Figure 17.** Identify the default view of the offers listed, i.e. the view of search results that appears automatically without choosing any preference

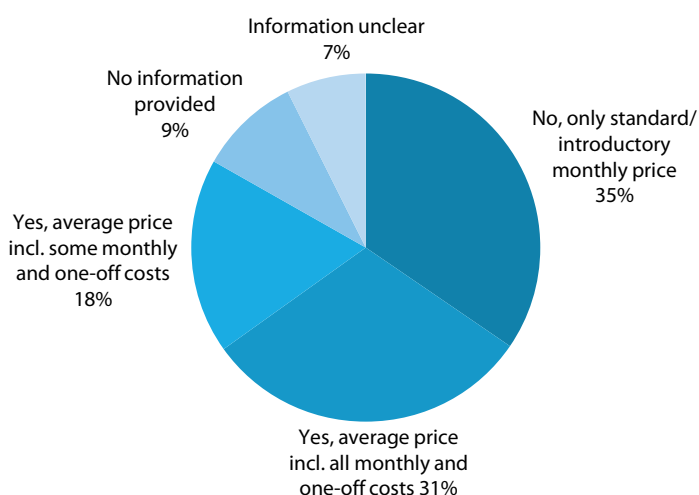
Source: Civic Consulting website evaluation, Question CW30. (N=305)



In 193 search trials on CWs, mystery shoppers identified the default ranking of the search results as being based on price, with the lowest price first. Conversely, in 41 searches no identifiable ordering could be ascertained by mystery shoppers. In a further 32 searches, the offers were ranked according to the name of provider. Other possibilities recorded by mystery shoppers were that the offers were ranked according to popularity (18 searches), contract duration (5 searches), connection speed (4 searches), and highest-price-first (2 searches). In 14 search trials the default ranking was categorised as other. On one of these the offers were ranked according to an 'expert rating'.

**Figure 18.** Does the CW offer the option to compare prices that include all monthly costs (including line rental) and all one-off costs and rebates, averaged over a certain period (e.g. six months, one, or two years)?

Source: Civic Consulting website evaluation, Question CW31. (N=298)



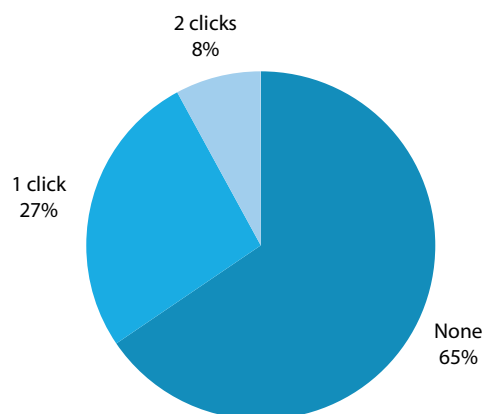
In just under half (49%) of search trials, CWs offered the option to see an average price that included some or all monthly and one-off costs – in 31% of cases this was



an average price including all costs, while in 18% of cases an average price including some costs was offered. However, in 35% of search trials, CWs only offered the standard or introductory monthly price. In a further 9% of searches, there was no information provided as to what components the price included, and in 7% of searches, the information on CWs was unclear.

**Figure 19.** How many clicks does it take to get from the default view to the lowest price view?

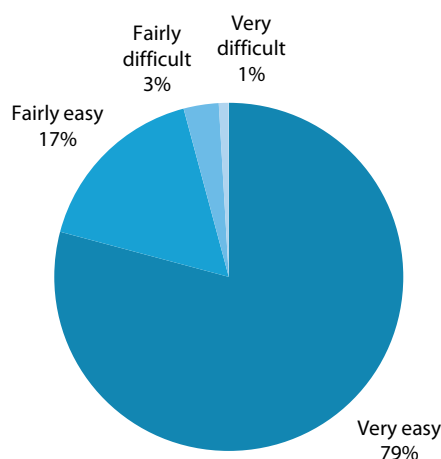
Source: Civic Consulting website evaluation, Question CW32. (N=252)



In almost two-thirds of search trials conducted on CWs (65%) the mystery shoppers recorded that no clicks were needed to get from the default view to the lowest price view (i.e. the lowest price view was the default view). In 27% of trials one click was needed and in 8%, two clicks.

**Figure 20.** Is it easy to find and adjust the CW to lowest price view?

Source: Civic Consulting website evaluation, Question CW33. (N=216)

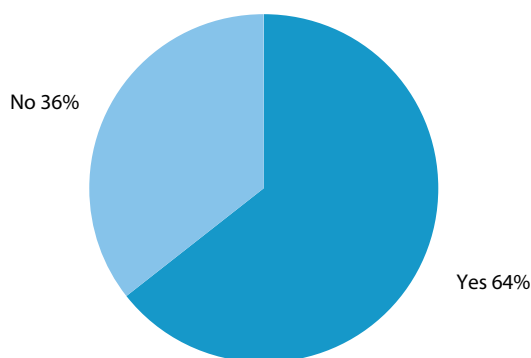


For four-fifths (79%) of product searches on CWs mystery shoppers considered it very easy to find and adjust the CW to the lowest price view. In a further 17% of instances this was deemed to be fairly easy. Only in 4% of instances was it difficult to adjust a

CW so that the search results were presented in the lowest price view (3% fairly difficult, 1% very difficult).<sup>8</sup>

**Figure 21. Can you identify the cheapest correct offer?**

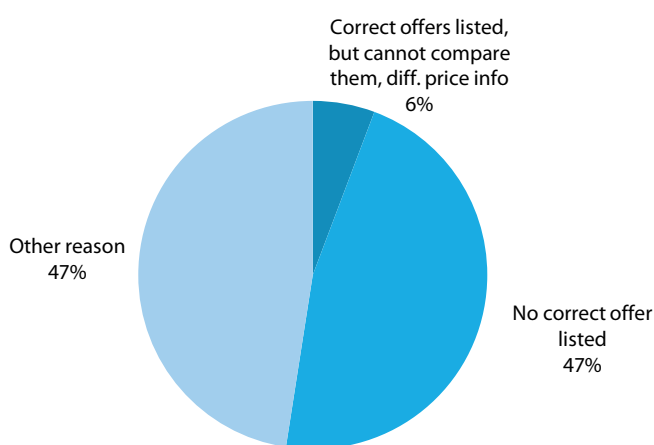
Source: Civic Consulting website evaluation, Question CW34. (N=309)



For 64% of search trials mystery shoppers could identify the cheapest correct offer. However, for the remaining 36% of searches they could not.

**Figure 22. If No, specify reasons:**

Source: Civic Consulting website evaluation, Question CW34. (N=112)



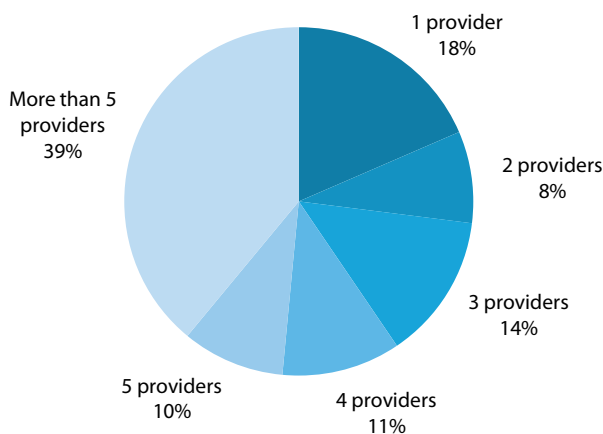
For those searches where mystery shoppers could not identify the cheapest correct offer, the two equally most common reasons reported were that no correct offer was listed (47%) and there was some other reason why this was not possible (47%). The 'other' reasons given were that there was not enough information about speed and bundle type to identify a correct offer, that the price information was incomplete, and that the search engine was not functioning. In a further 6% of search trials correct

<sup>8</sup> It is possible that some mystery shoppers may have selected 'very easy' for this question where the default ranking of the CW was according to price.

offers were listed, but it was not possible to compare them because they contained different price information.

**Figure 23.** Please specify the total number of providers listed with a correct offer (i.e. correct bundle type and within speed range).

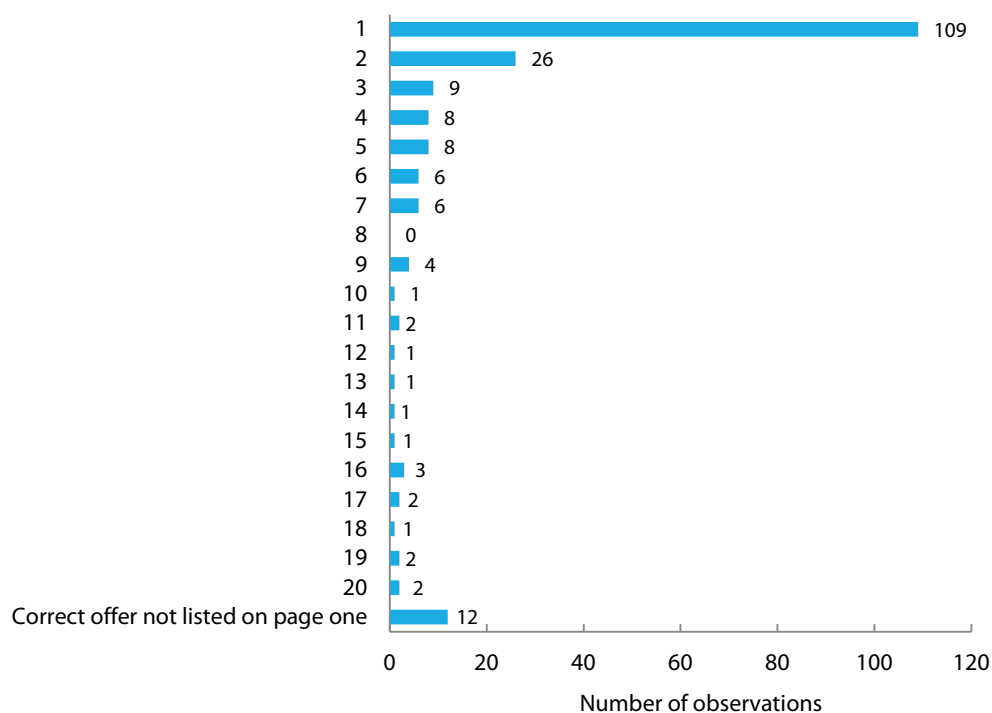
Source: Civic Consulting website evaluation, Question CW35. (N=200)



In 39% of the search trials there were more than 5 providers listed with a correct offer. The other searches are divided fairly evenly between those which returned 5 providers (10%), 4 providers (11%), 3 providers (14%), and 2 providers (8%) offering the requested product. In almost one fifth (18%) of searches just 1 provider with a correct offer was identified.

**Figure 24.** What is the rank of the cheapest correct offer listed?

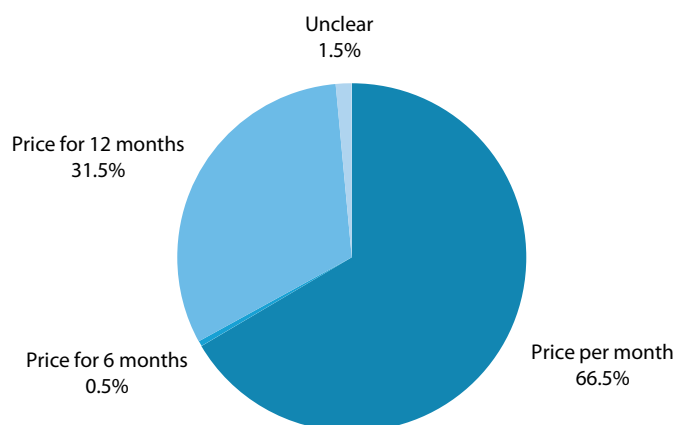
Source: Civic Consulting website evaluation, Question CW37. (N=200; N is slightly lower than the total number of observations shown in the figure because in five cases the 'correct offer not listed on page one' item was indicated in addition to one of the other options, e.g. the offer was not listed on page one despite being ranked eighth.)



In 109 searches, the cheapest correct offer was the first search result listed. In 96 searches, it appeared below the first item; it was presented as the second offer in 26 of these cases. Only in 12 searches was the correct offer not listed on the first page.<sup>9</sup>

**Figure 25.** Please specify the price period

Source: Civic Consulting website evaluation, Question CW42. (N=203)



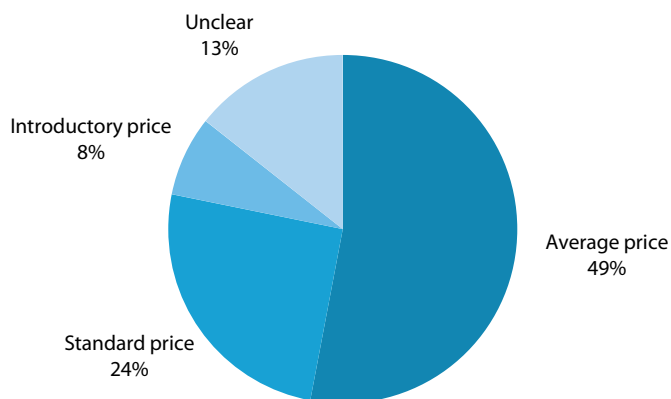
Mystery shoppers found that in almost 67% of searches the price listed for the cheapest correct offer was the price per month. In 31.5% of searches the price applied

<sup>9</sup> On some CWs the cheapest correct offer was not among the first 20 results, but it was listed on the first page. In these cases, the mystery shoppers were told to leave this question unanswered and explain the situation in the final comment field.

for a 12 month period. Only in 1 case (0.5% of searches) was the price listed for a 6 month period. In 1.5% of searches it was unclear for what time period the price applied.

**Figure 26. Please specify the price type**

Source: Civic Consulting website evaluation, Question CW42. (N=202)

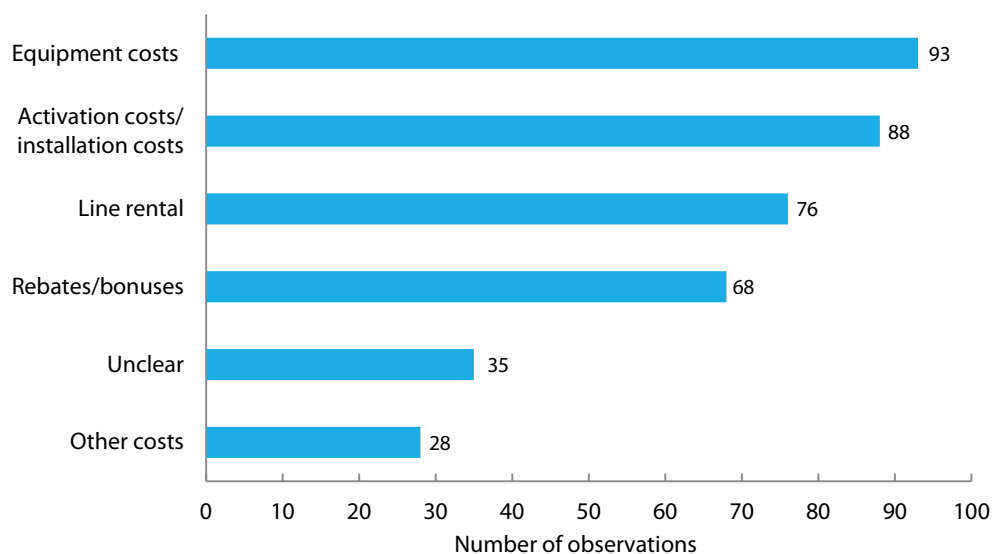


In 49% of cases the average price was provided. In a further 24% the standard price was displayed.<sup>10</sup> Only in 8% of cases did mystery shoppers record that the introductory price was listed. In 13% of cases it was unclear to the mystery shoppers what type of price information was offered.

<sup>10</sup> The term 'standard price' is defined as the price applicable throughout the duration of the contract, i.e. after the expiration of any special or 'introductory' prices. In contrast, an 'average price' takes into account some or all additional cost components beyond the standard price of the broadband Internet connection itself (e.g. equipment costs, installation fees, line rental, or lower introductory prices).

**Figure 27.** Does this price include one or more of the following components? (multiple answers possible)

Source: Civic Consulting website evaluation, Question CW43. (N=176)

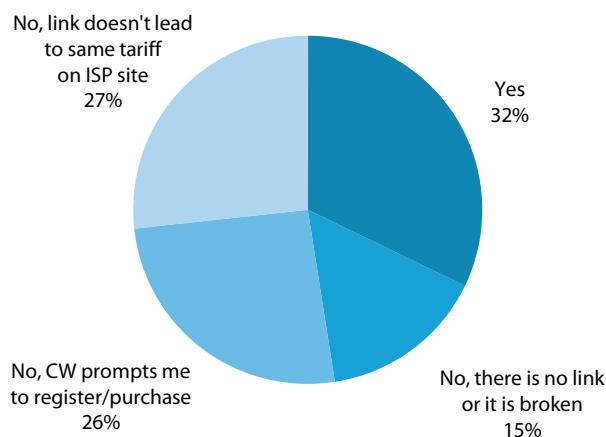


The most common component to be included in the price was the cost of equipment (93 cases). This was followed by activation/installation costs (88 cases), line rental (76 cases) and rebates/bonuses (68 cases). In 35 cases it was unclear which components were included in the price. Finally, in 28 cases other types of costs were listed. From the comments made by mystery shoppers it is clear that in several of these cases shipping costs were included in the displayed price,<sup>11</sup> and in a couple of cases the price was listed as including all 'start-up costs' or 'entry costs'. One mystery shopper recorded the listing of an invoice fee.

<sup>11</sup> Where shipping/postage/delivery costs were included in the displayed price, mystery shoppers sometimes noted that these charges were explicitly linked to the shipment of relevant equipment (e.g. a cable modem or wireless router). In other instances, no explanation of these costs was recorded by the mystery shoppers. While we would assume that these costs generally refer to the shipment of equipment, the charges could instead (or in addition) be associated with the delivery of contract papers or other documentation.

**Figure 28.** Does the link take you directly to the page with the correct offer on the ISP website?

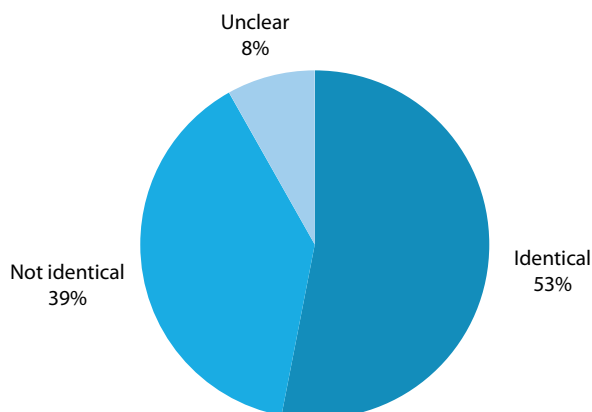
Source: Civic Consulting website evaluation, Question CW44. (N=202)



In less than a third of recorded cases (32%) did a CW's link take the mystery shopper directly to the page with the correct offer on the ISP website. In 15% of trials, there was no link or it was broken, and in 27% of trials there was a link to the ISP site, but it did not lead directly to the same tariff. Mystery shoppers recorded that in 26% of trials CWs prompted them to register or purchase when they clicked on the link for the offer.

**Figure 29.** Is the price provided on the CW for this offer identical to the price on the ISP website?

Source: Civic Consulting website evaluation, Question CW47. (N=49)

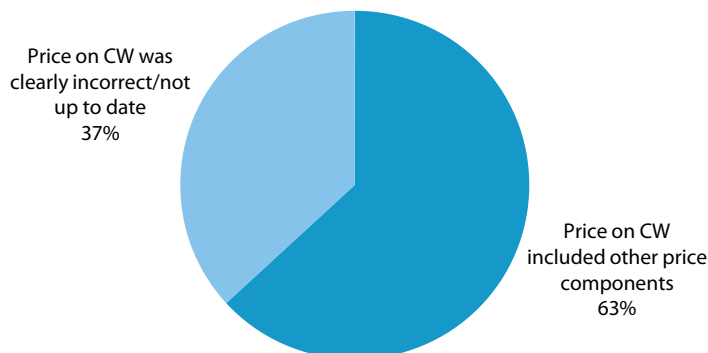


In just over half (53%) of the cases the price provided on the CW was identical to the price on the ISP website. In 39% of cases the price was not identical, and in 8% it was unclear.<sup>12</sup>

<sup>12</sup> There were relatively few responses to this question because it was only answered for those CWs where there was a functioning link to the correct offer on the ISP website. This also applies for questions 47-49.

**Figure 30.** *If not identical, provide reason:*

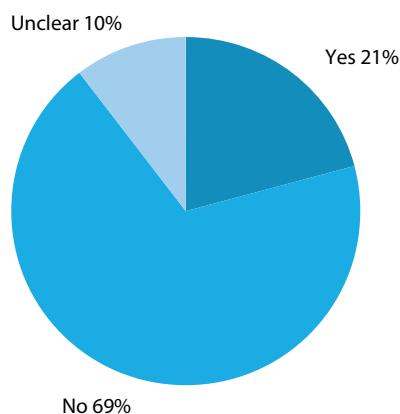
Source: Civic Consulting website evaluation, Question CW47. (N=19)



In 37% of those cases where the price on the CW was not identical to that on the ISP this was because the price was clearly incorrect or not up to date. In 63% of cases the inconsistency was caused by the presence of other price components on the CW (in some of these cases, the total price was higher on the CW, in others, it was lower; sometimes the line rental component was priced differently, and in at least one case, the monthly cost component differed because an ISP showed only the introductory price, valid for a specific number of months).

**Figure 31.** *Are there price components listed on the ISP website which were not included in the price information on the CW and therefore lead to a higher price of the actual offer?*

Source: Civic Consulting website evaluation, Question CW48. (N=48)

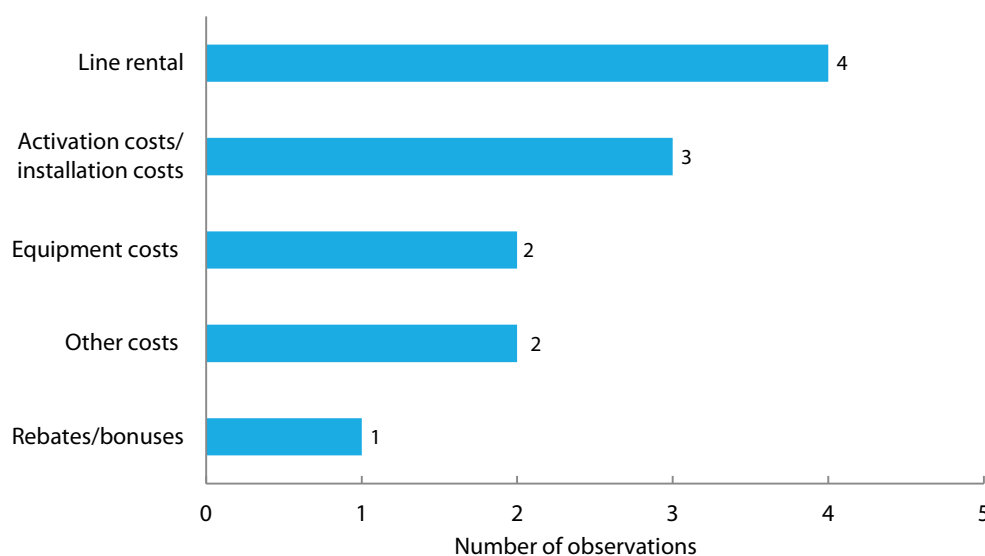


In 21% of cases mystery shoppers recorded that there were price components listed on the ISP website which were not included in the price information on the CW and therefore led to a higher price of the offer. In more than two thirds (69%) of cases were there no additional components. In another 10% of cases it was unclear if there were additional price components that led to a higher price.



**Figure 32.** *If yes, mark the price components that were not included in the price information on the CW and that lead to a higher price of the actual offer (multiple answers possible):*

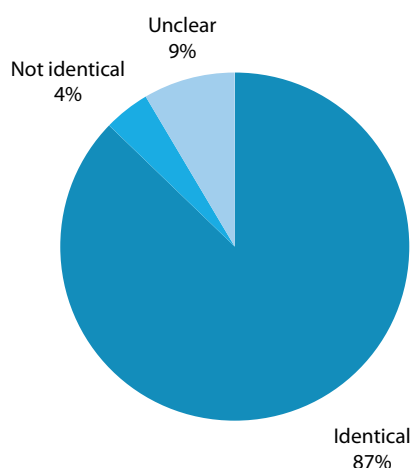
Source: Civic Consulting website evaluation, Question CW48. (N=10; There are actually 12 individual indications of missing components but these are based on 10 cases in which the price components listed on the ISP website had not been included on the CW.)



The most common price component not to be included on the CW but to be listed on the ISP website was line rental (4 cases). This was followed by activation/installation costs (3 cases), equipment costs (2 cases) and rebates/bonuses (1 case). In another two cases mystery shoppers noted an additional cost component that was classified as other, the text in one of these cases referred to a 'standalone charge'.<sup>13</sup>

**Figure 33.** *Is the speed provided on the CW for this offer identical to the speed on the ISP website?*

Source: Civic Consulting website evaluation, Question CW49. (N=47)



In nearly all cases in which a CW provided a functioning link to the offer on the ISP website the speeds provided on the two websites were identical (87%). In 4% of

<sup>13</sup> In five additional cases (all from the UK), which are not reflected in the above figure, a mystery shopper's comments indicated that while it was unclear whether there were price components listed on the ISP website which were not included in the price information on the CW, that did appear to be the case. In each of these instances the component in question was line rental.

cases, however, the speeds were not identical, and in 9% of the cases the comparison led to unclear results.

### **Overall assessment of the comparison websites**

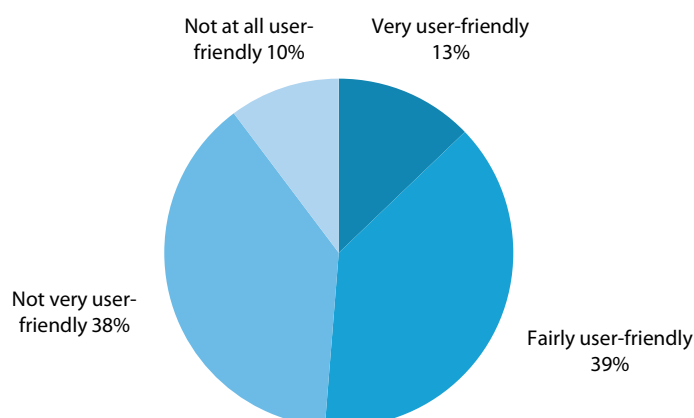
Mystery shoppers addressed the following assessment questions once per comparison website (after they had conducted up to five product searches on each website). Thus, in comparison to the previous section, the sample now comprises individual comparison websites rather than a larger number of product searches.

#### *User-friendliness of the comparison websites*

Just over half (52%) of CWs were considered to be user-friendly by the mystery shoppers (39% fairly user-friendly, 13% very user-friendly). However, 48% were categorised as not user-friendly (38% not very user-friendly, 10% not at all user-friendly).

**Figure 34.** How would you rate the user-friendliness of the CW?

Source: Civic Consulting website evaluation, Question CW588. (N=78)



One factor which likely negatively affected the user-friendliness of the CWs was related to the ability to effectively compare prices. Nine mystery shoppers recorded a problem with the price information or comparison function on the CWs, such as the absence of a lowest price view or all price components. In addition, on 19 CWs mystery shoppers recorded insufficient or malfunctioning search functions on the CWs as a factor that negatively affected user-friendliness. On some of these CWs it was impossible to narrow down results according to download speed or bundle type. Other problems arose in relation to the CW search function, such as on two websites where it was only possible to search for a specific speed, rather than a speed range. On some CWs it was impossible to search by location or there was some problem with the location search function. For example, it was only possible to search by region. Another issue raised by seven mystery shoppers was that the CWs did not provide sufficient information about the offers. On a further eight websites, the

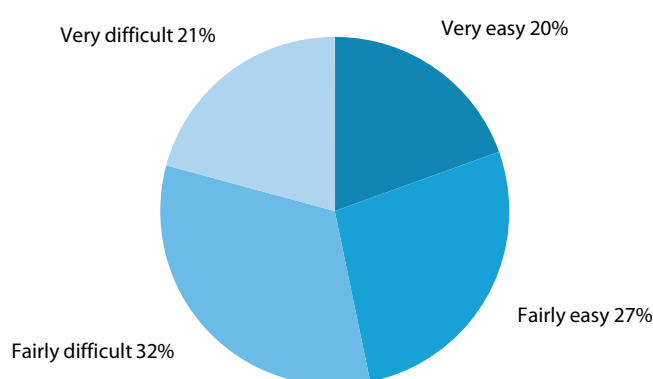
mystery shoppers stated that the usability of the CW was impaired by the poor presentation of the websites or the existence of too much information.

*Ease of comparing prices of offers*

Less than half (47%) of CWs were rated positively in terms of the ease with which the prices of offers could be compared (27% fairly easy, 20% very easy). 53% of CWs were structured in a way that made it difficult to compare prices, according to mystery shoppers (32% fairly difficult, 21% very difficult).

**Figure 35.** *Did you find it easy to compare the prices of the different offers listed on the CW?*

Source: Civic Consulting website evaluation, Question CW589. (N=77)



The problems of comparing prices on CWs can be illustrated with some examples from mystery shoppers' comments. For example, on some CWs mystery shoppers reported problems relating to the lowest price view. On four of these mystery shoppers recorded that no lowest price view was available, while on one Danish CW it was possible to rank products according to price but not at the same time as filtering the results for a particular location or particular product specifications. One Czech website provided the opportunity to search for location or specifications and filter by price simultaneously, but required some of the specifications to be re-entered after changing the ranking to lowest price first.

Further problems were caused by the incompleteness of price information. On four CWs, three of which were in the UK, mystery shoppers commented that the prominently displayed price, or indeed the only price given, was sometimes only an introductory price that applied for a limited period of time. On a further two CWs mystery shoppers recorded that it was unclear if the price was introductory or not. On 18 CWs mystery shoppers recorded that additional monthly or one-off costs, such as line rental or activation fees, were not included, hard to find, or unclear. On one Polish CW there was no price displayed at all for some offers.

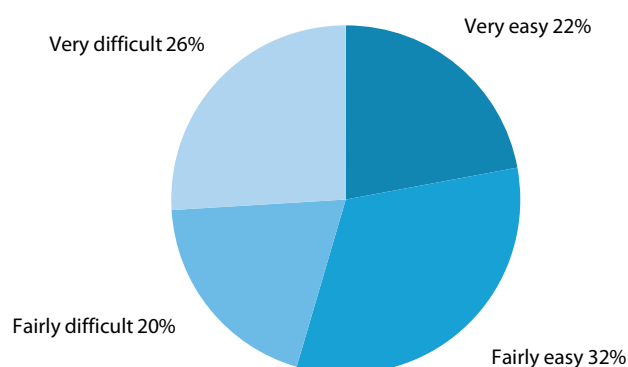
A comparison of prices was also impaired where the price information was inconsistent. On three CWs the price of certain offers included line rental while that of others did not. This sometimes meant that the cheapest product was significantly further down in the rankings than it should have been. Inconsistent information about one-off costs such as activation fees and equipment costs was also recorded by mystery shoppers on four CWs. On two of these occasions, product descriptions from the supplier for some products contained the information that activation or equipment was free, while for other products there was no mention of activation or equipment costs at all, leaving uncertainty on whether they were applicable or had also been waived by the supplier. On the other two CWs a total first year cost was provided for some offers, but not for others.

*Ease of comparing technical aspects of offers*

On more than half of CWs (54%) mystery shoppers indicated that they could either fairly or very easily compare the technical aspects of different products (32% and 22% respectively). However, 46% of CWs were rated negatively in this regard (20% fairly difficult, 26% very difficult).

**Figure 36.** Did you find it easy to compare the technical aspects of offers on comparison websites?

Source: Civic Consulting website evaluation, Question CW590. (N=77)



Judging by the frequency of the comments provided by mystery shoppers, one of the common problems encountered was that it was impossible to filter or rank the results according to technical aspects, such as speed or bundle type. This was mentioned by six mystery shoppers and is backed up by the results in Figure 14 about possible search criteria. From Figure 14 we can see that 58 out of 81 CWs offered the possibility to search according to download speed, while only 38 allowed the consumer to filter the results according to bundle type.

In addition, some CWs did not display all the relevant information on products' technical aspects. On one Irish CW, for example, the mystery shopper commented that the download speed was not clearly displayed in the listings and only became

visible when one clicked on the offer itself. On two other CWs the mystery shoppers stated that the download speed was the only technical information provided, while one CW only displayed download speed and type of technology. On one UK CW the mystery shopper specified that upload speed was missing and in the case of one Norwegian CW it was recorded that no download limit was displayed.

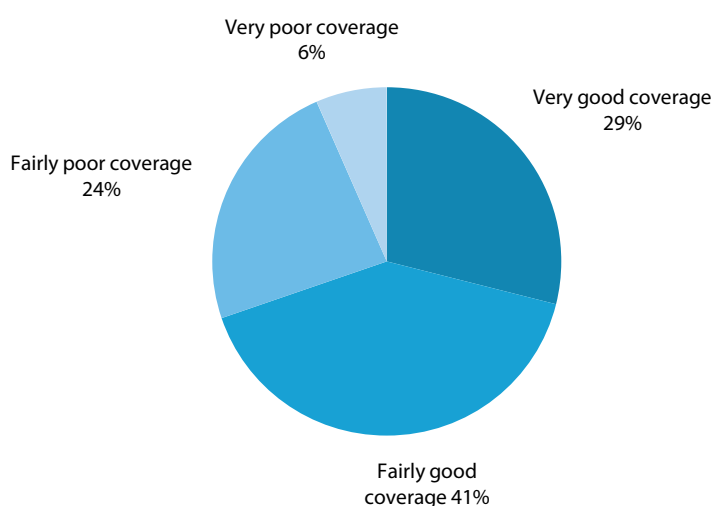
However, as stated above, over half of CWs (54%) made it easy for the consumer to compare the technical aspects of different products, according to the mystery shoppers. Based on their comments, it appears that CWs generally displayed the download speed of offers and on many CWs it was also possible to filter the results according to some of their technical aspects. On ten CWs the mystery shoppers commented that the technical information was displayed clearly and prominently in the listings.

#### *Coverage of offers from different ISPs*

70% of CWs were considered by mystery shoppers to provide good coverage of different Internet providers' offers (41% fairly good, 29% very good). Sometimes the mystery shoppers commented that most, or even all, nationally operating ISPs appeared to be represented. Only 30% of CWs were assessed as providing poor coverage (24% fairly poor, 6% very poor). On a few of these mystery shoppers recorded that major providers were missing. One CW only listed nationally operating ISPs and did not display offers from regional providers.

**Figure 37.** How good would you estimate the coverage of offers from different Internet providers on this CW to be?

Source: Civic Consulting website evaluation, Question CW591. (N=76)



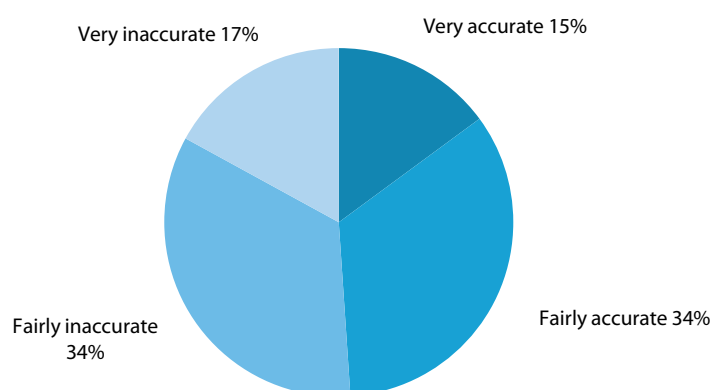
#### *Accuracy of information provided*

Mystery shoppers were asked to assess the accuracy of information provided on the CW when compared with the information given on the ISP website. Not all CWs were assessed on their accuracy because they did not all provide a direct link to the offer

on the ISP webpage. This meant that the information could not be directly compared. Some CWs required that the user register before they could access direct links to the ISPs. Therefore, only 47 out of 81 CWs were evaluated in this regard. Of those which were assessed, only 49% were assessed as providing accurate information (34% fairly accurate, 15% very accurate). Just over half (51%) provided information that tended to be inaccurate, according to the mystery shoppers.<sup>14</sup>

**Figure 38.** How accurate was the information provided on the CW when compared with the information given on the ISP website?

Source: Civic Consulting website evaluation, Question CW592. (N=47)



Some of these inaccuracies were caused by the existence of additional cost components that were not listed on the CW. This was commented by mystery shoppers on six CWs. On seven CWs, however, the mystery shoppers commented that price information given by the CW was clearly wrong or out-of-date. Sometimes the price differences were small, but in one case the inaccuracy in price information amounted to more than a hundred Euro (when considering the yearly price). On two CWs the description of the technical aspects, such as download speed, did not match that on the ISP websites. Indeed, on three occasions the offers identified by the CW did not appear to exist on the website of the ISP at all. However, on two CWs the mystery shoppers commented that the price listed on the CW initially appeared to be higher than that on the ISP website, as additional cost components were more visible.

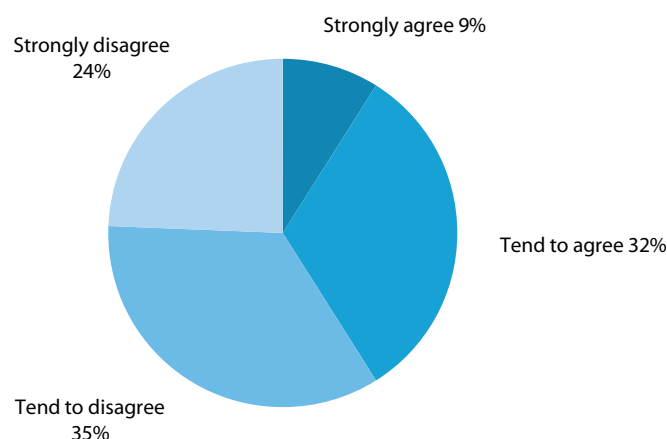
#### *Usefulness towards informed choice*

41% of mystery shoppers agreed that the CWs were helpful in allowing them to make an informed consumer choice (32% tend to agree, 9% strongly agree). By contrast, 59% of mystery shoppers disagreed that the CWs were helpful in this regard (35% tended to disagree, 24% strongly disagree).

<sup>14</sup> It should be noted that in a number of cases the mystery shoppers falsely assessed the information as inaccurate, where there was in fact no functioning link to the offer page of the ISP.

**Figure 39.** Indicate your level of agreement with the following statement: 'I found this CW to be useful in allowing me to make an informed choice'

Source: Civic Consulting website evaluation, Question CW593. (N=78)



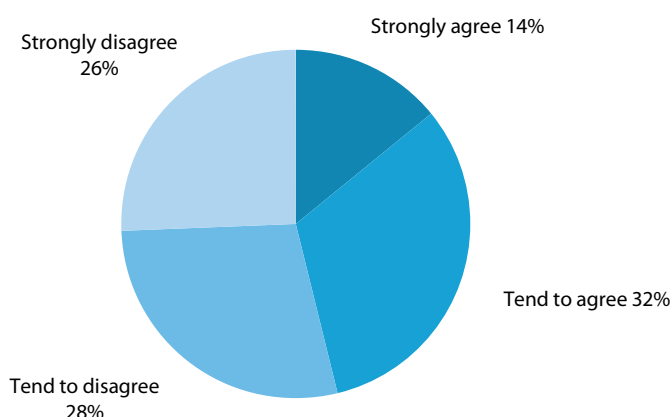
Some examples were mentioned by the mystery shoppers in their comments as to why they did not consider the CWs to be helpful in making an informed choice. For example, four mystery shoppers highlighted the lack of sufficient search possibilities, while five mentioned incomplete or unclear price information and six mentioned missing technical information. Six mystery shoppers indicated that they would have to do further research in order to be able to make an informed choice, for example by visiting the websites of the ISPs. As a result, one mystery shopper indicated in regard to a Finnish CW that it offered no advantage over searching the ISPs themselves. Nonetheless, six mystery shoppers suggested in their comments that the CWs were helpful in providing a broad overview of the types of products available and their general price range. On five CWs in Spain and the UK mystery shoppers indicated that the CW listed much valuable information, but that some time was required to achieve an accurate understanding of the offers and their prices.

#### *Clarity and understandability of price information*

Just under half (46%) of CWs presented price information in a manner that was considered to be clear and understandable by the mystery shoppers (32% tend to agree, 14% strongly agree). On the remaining 54% of CWs the mystery shoppers disagreed that this was the case and felt that the price information tended to be unclear or not understandable (28% tend to disagree, 26% strongly disagree).

**Figure 40.** Indicate your level of agreement with the following statement: 'This CW provided clear and understandable price information'.

Source: Civic Consulting website evaluation, Question CW594. (N=78)



Mystery shoppers considered the price information on some CWs to be unclear because it was incomplete or inconsistent. On some CWs the prominently displayed price, or indeed the only price given, was an introductory price which expired after a certain number of months. This led to some products being listed as costing nothing at all, because they came with a certain number of free months. Another problem observed by eleven mystery shoppers was that important price elements, such as activation fee or equipment costs, were not included, unclear or hard to find. This was also observed by other mystery shoppers in their comments to the question on price comparability. Additionally, on five CWs, all from the UK, the mystery shopper specified that line rental was not included in the listed price. Further problems were caused where the price information was inconsistent. For example, for some offers the standard monthly price was listed, while for others only the introductory price.

Some websites presented the option of seeing the total first year cost or average monthly cost (including one-off costs and line rental), as is shown below in Figure 26. Six mystery shoppers commented that this helped them to understand the full price of the offers.

However, in one case a mystery shopper commented that the total first year prices presented by a UK CW included one-off costs such as activation and equipment, as well as any monetary bonuses/rebates, but excluded the cost of line rental. Sometimes the websites claimed to be displaying the total first year price or average monthly price but did not make it clear which factors were included within this sum. A few mystery shoppers therefore expressed confusion as to which cost factors were actually included in the advertised prices of the offers.

On some of the CWs which ranked products according to incomplete price information, it was possible to find details about the remaining price elements elsewhere on the website. For example, if one clicked on the product one might be taken to another page, where all the various cost factors were clearly laid out. This



meant that the consumer could manually sort through the different products, add up the different factors and compare the prices.

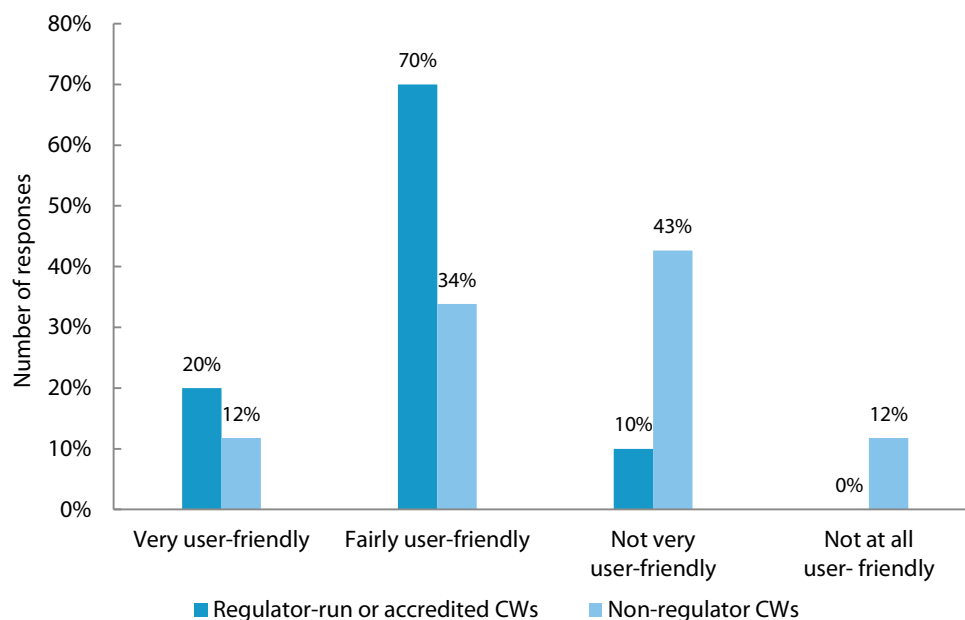
### 2.2.2 Comparative assessment: CWs administered or accredited by regulatory authorities and other CWs

The following section again presents the results of the mystery shoppers' overall assessment of the comparison websites, but in this instance the results are presented separately for those CWs administered or accredited by regulatory authorities, on the one hand, and the remaining CWs, on the other. Overall, 10 of the 81 evaluated CWs were administered (8) or accredited (2) by regulatory authorities, while the remaining 71 were not associated with regulatory authorities or information on their administrator was unclear or not provided.

The CWs administered or accredited by regulatory authorities did well when rated by mystery shoppers on their user-friendliness. Seven of 10 (70%) were described as fairly user-friendly while a further 2 (20%) were very user-friendly (see figure below). Only one (10%) was considered not very user-friendly and none were considered to be not at all user-friendly. In this case, the mystery shopper indicated there was not sufficient information provided and noted the absence of direct links to the websites of the ISPs whose offers were presented.

**Figure 41.** How would you rate the user-friendliness of the CW?

Source: Civic Consulting website evaluation, Question CW588. (N=78: 10/68)



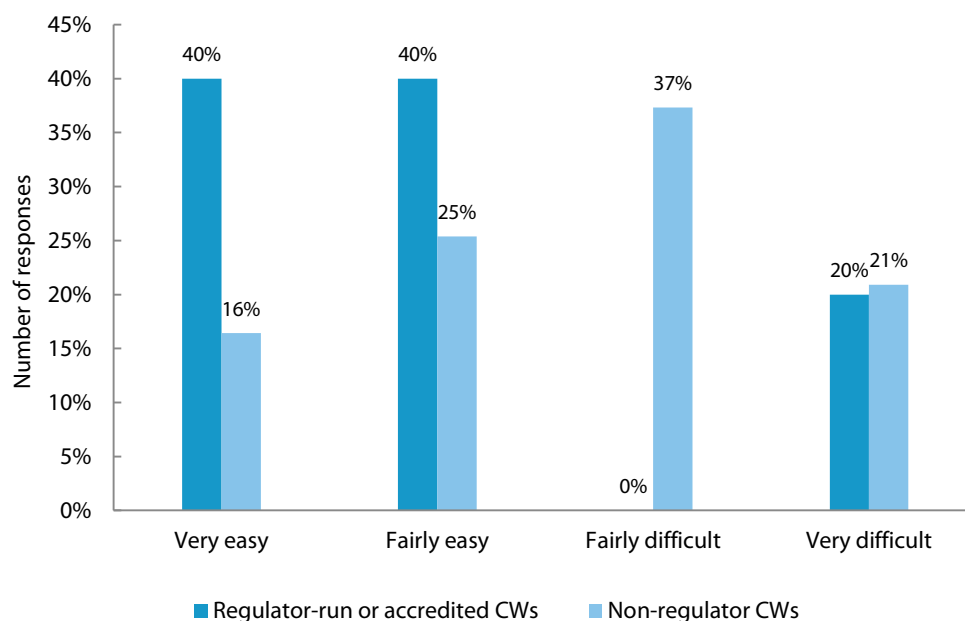
The non-regulator CWs did not fare as well as the regulator and regulator-accredited CWs when assessed in terms of user-friendliness. While only one regulator/regulator-accredited CW (10%) was considered not to provide a friendly interface to users, this

was the case for over half of non-regulator CWs (55%). More than 1 in 10 (12%) non-regulator CWs were deemed to be not at all user-friendly.

The regulator and regulator-accredited CWs were also assessed well in terms of the ease of comparing prices. On 80% of these CWs (8 of 10) the mystery shoppers considered it easy to compare prices (40% fairly easy, 40% very easy). On the remaining 20% this was deemed very difficult (see the following figure).

**Figure 42.** Did you find it easy to compare the prices of the different offers listed on the CW?

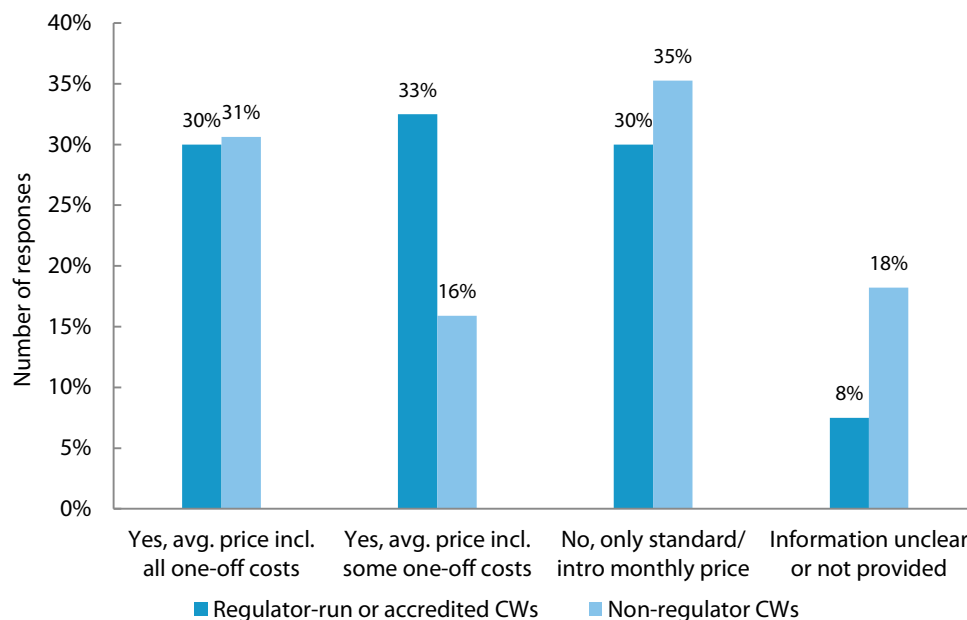
Source: Civic Consulting website evaluation, Question CW589. (N=77: 10/67)



The other CWs were not assessed as highly as the regulator-run or accredited CWs, when evaluated on the ease of comparing prices. Mystery shoppers considered it easy to compare prices on less than half (41%) of non-regulator CWs (25% fairly easy, 16% very easy). The remaining 58% of non-regulator CWs made it difficult for the consumer to compare prices (37% fairly difficult, 21% very difficult).

**Figure 43.** Does the CW offer the option to compare prices that include all monthly costs (including line rental) and all one-off costs and rebates, averaged over a certain period (e.g. six months, one, or two years)?

Source: Civic Consulting website evaluation, Question CW31. (N=298: 40 searches on regulator-run/accredited CWs and 258 on non-regulator CWs)

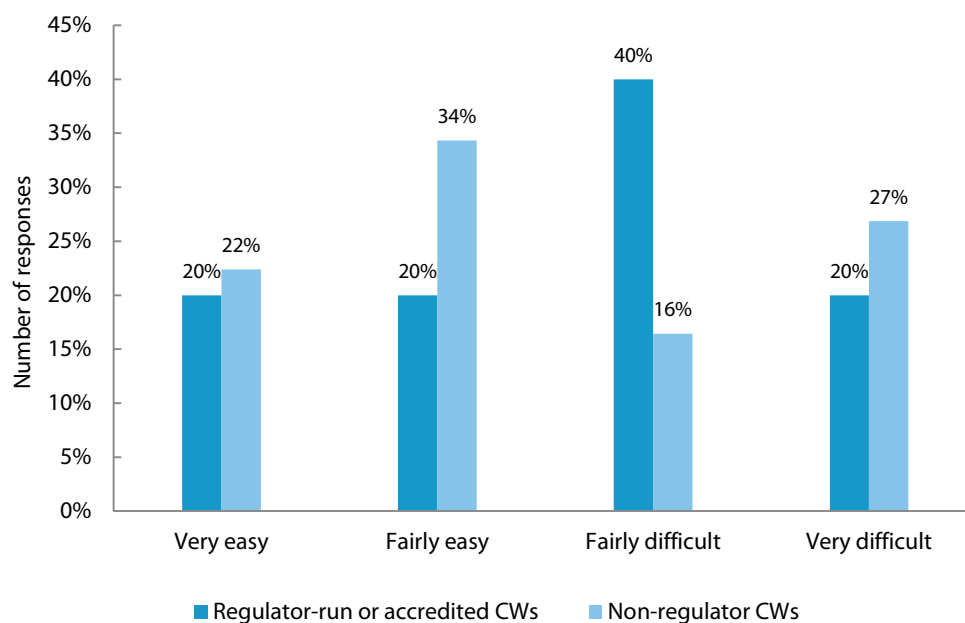


As the figure above shows, regulator-run or accredited CWs were overall more likely to offer the option to compare prices that included monthly costs and all or some one-off costs (or rebates), spreading the latter over a multi-month or year period to show an 'averaged' price. Indeed, whereas in 63% of searches regulator-run or accredited CWs offered mystery shoppers the possibility to compare averaged prices that included at least some one-off costs, the figure was lower (47%) for non-regulator CWs (notably, though, in 31% of cases non-regulator CWs allowed comparison of prices that included all one-off costs, while 30% of regulator-run or accredited CWs did the same).<sup>15</sup> Non-regulator CWs were also more likely to provide unclear information on this point, or to provide none at all (18% of cases compared to 8%).

<sup>15</sup> Mystery shoppers answered this question for all five pre-defined products. In this figure, only the results for Product 1 are displayed. This has been done because the response rate for this question was vastly higher for Product 1 (80 out of 81 total CWs) than for the other four products (e.g. for Product 2, only 51 of 71 non-regulator CW questionnaires contained a response for this question).

**Figure 44.** Did you find it easy to compare the technical aspects of different offers listed on the CW (speed, download limit, etc.)?

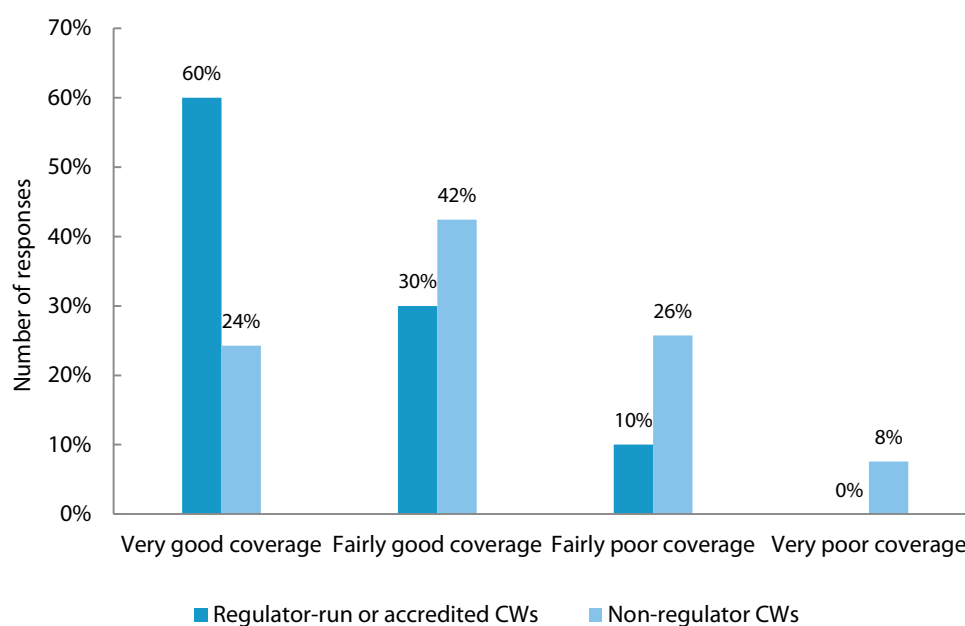
Source: Civic Consulting website evaluation, Question CW590. (N=77: 10/67)



According to the mystery shoppers, the regulator and regulator-accredited CWs made it less easy to compare technical aspects of offers than the non-regulator CWs (see the figure above). On 6 of the 10 regulator-run or accredited websites (60%) a comparison of the technical aspects was deemed difficult by mystery shoppers. Only on 40% of regulator-run or accredited websites was this considered easy (20% fairly easy, 20% very easy). By contrast, on 56% of non-regulator CWs the mystery shoppers recorded that it was easy to compare the technical aspects of offers (34% fairly easy, 22% very easy). Just 43% of non-regulator CWs were rated negatively in this regard. However, on a higher proportion of non-regulator CWs the mystery shoppers considered it very difficult to compare technical aspects (27% compared to 20%).

**Figure 45.** How good would you estimate the coverage of offers from different Internet providers on this CW to be?

Source: Civic Consulting website evaluation, Question CW591. (N=76: 10/66)

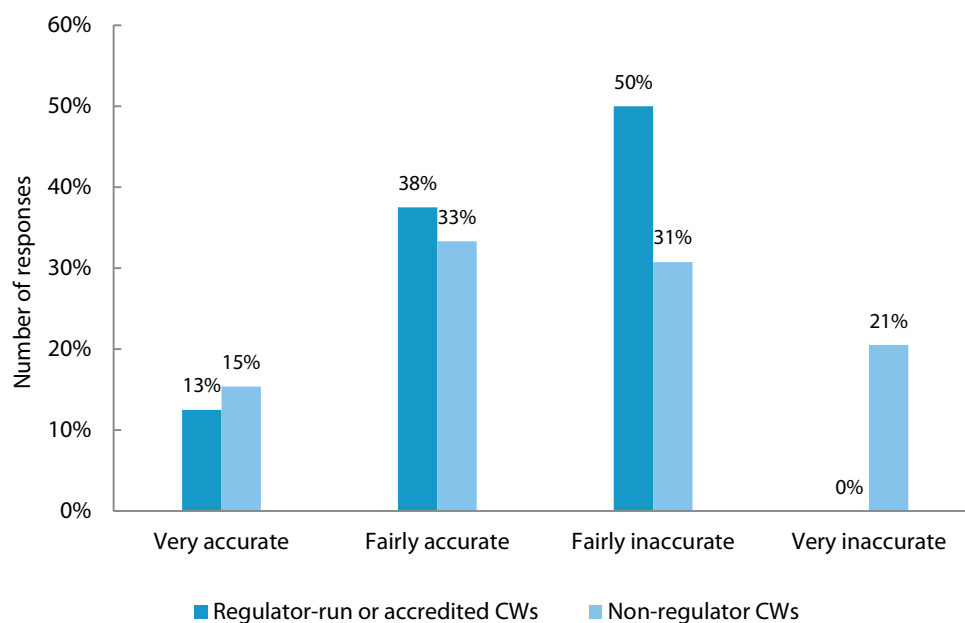


Overwhelmingly, regulator-run or accredited CWs were assessed highly in terms of their coverage of offers. While 6 in 10 (60%) were deemed to offer very good coverage and 3 (30%) to offer fairly good coverage, only 1 (10%) was characterised as providing fairly poor coverage. None of these CWs were considered to have very poor coverage.

The other CWs were also rated fairly well on their coverage of offers – two thirds (66%) were considered to provide good coverage (42% fairly good, 24% very good). However, they did not fare as well as the regulator-run or accredited CWs. On 34% of non-regulator CWs the mystery shoppers recorded that the coverage was poor, compared to only 1 regulator-run or accredited CW (10%). Moreover, on 8% of non-regulator CWs the coverage was described as very poor, which was not the case for any regulator-run or accredited CWs.

**Figure 46.** How accurate was the information provided on the CW when compared with the information given on the ISP website?

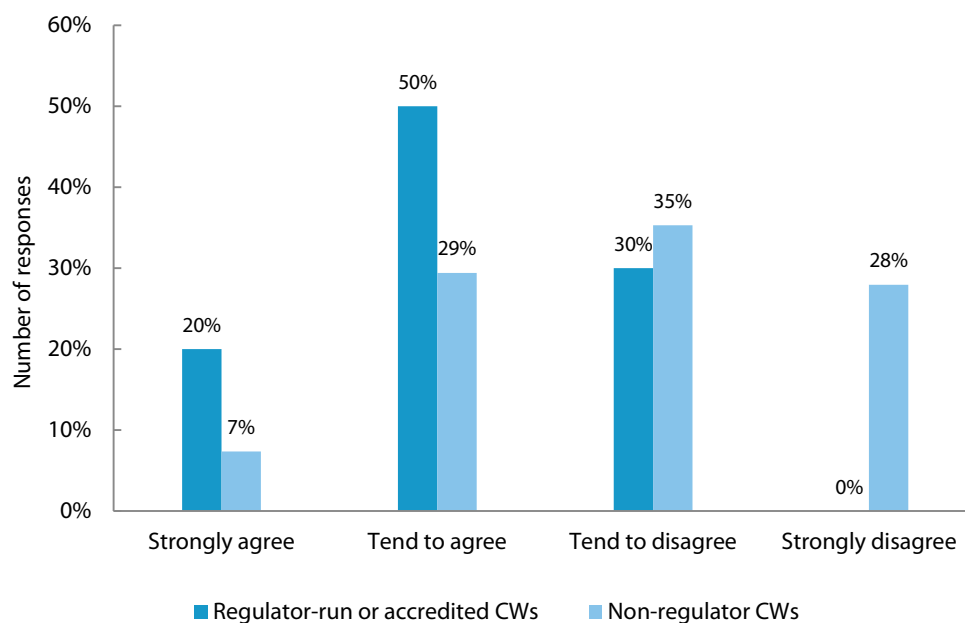
Source: Civic Consulting website evaluation, Question CW592. (N=47: 8/39)



As assessed by the mystery shoppers, the information provided on the regulator-run or accredited CWs does not appear to have been significantly more accurate than that provided by the non-regulator CWs, as observed by mystery shoppers. Of the 8 regulator-run or accredited CWs assessed on this point, 4 were rated accurate (1 very accurate; 3 fairly accurate), while the remainder were assessed as fairly inaccurate. No regulator-run or accredited CWs were described as very inaccurate. The assessments of the non-regulator CWs were also split fairly evenly between accurate and inaccurate, although a marginally higher percentage of non-regulator CWs were assessed as providing inaccurate information. Just over half (52%) of the non-regulator CWs were considered by mystery shoppers to provide inaccurate information, while 48% were assessed as accurate. One-fifth (21%) of non-regulator CWs were considered very inaccurate, which was not the case for any regulator-run or accredited CWs.

**Figure 47.** Indicate your level of agreement with the following statement: 'I found this CW to be useful in allowing me to make an informed choice'.

Source: Civic Consulting website evaluation, Question CW593. (N=78: 10/68)

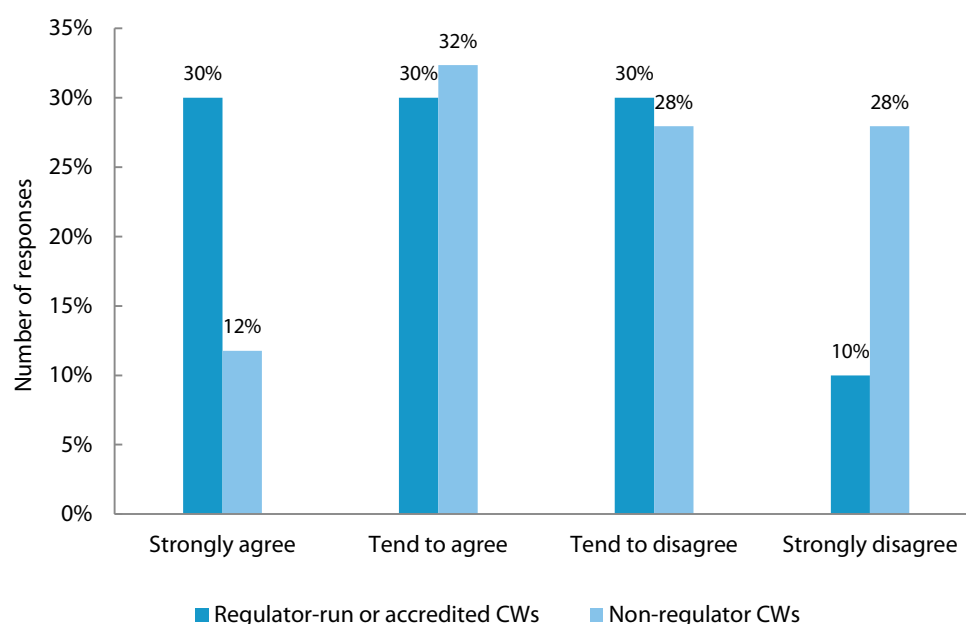


Seven out of the 10 (70%) regulator-run or accredited CWs were deemed useful in allowing the consumer to make an informed choice. For 2 (20%) regulator-run or accredited CWs the mystery shoppers strongly agreed that this was so. In the remaining 3 cases (30%), the mystery shoppers tended to disagree, considering the CWs not to be helpful in this regard. On none of the regulator-run or accredited CWs did the mystery shoppers strongly disagree and thereby indicate a fully unfavourable assessment of a CW's usefulness.

The results are reversed for the non-regulator CWs. In almost two thirds of cases (63%) the mystery shoppers disagreed that the websites were useful in contributing to an informed choice. A total of 28% of mystery shoppers strongly disagreed that these CWs were helpful in this way. For just 36% of non-regulator CWs the mystery shoppers agreed that the websites aided the consumer to make an informed choice. On 29% of CWs they tended to agree, while on only 7% did they strongly agree.

**Figure 48.** Indicate your level of agreement with the following statement: 'This CW provided clear and understandable price information'.

Source: Civic Consulting website evaluation, Question CW594. (N=78: 10/68)



The regulator-run or administered CWs were also assessed more favourably than the non-regulator websites in terms of providing clear and understandable price information. More than half (6 of 10 or 60%) of comparison websites in the former group were rated positively on their provision of clear and understandable price information (tend to agree in 3 cases; strongly agree in 3 cases). However, 4 out of the 10 regulator-run or accredited CWs (40%) were seen as not providing clear and understandable price information (tend to disagree in 3 cases; strongly disagree in 1 case).

In the case of the non-regulator CWs, less than half (44%) were considered by mystery shoppers to provide price information which was clear and understandable (32% tend to agree, 12% strongly agree). The remaining 56% of non-regulator CWs were divided evenly between those for which mystery shoppers tended to disagree and those for which they strongly disagreed that price information was clear. These numbers signal that overall the non-regulator CWs were considered to provide less-clear price information than the regulator-run or accredited CWs, 60% of which were identified as offering clear and understandable information.

Though regulator-run or accredited CWs were more favourably assessed by mystery shoppers overall, it is important to note that many privately run CWs were rated highly by the mystery shoppers. As evidence of this, and to provide some examples of good practice that were identified by mystery shoppers' website assessments, a partial list of positively assessed CWs is included below. The listed websites all had search-by-location functionality, provided averaged or inclusive 'final' prices which took into account items like line rental and some or all one-off costs (e.g. equipment, installation, or shipping fees), and received only positive ratings for the seven general



assessment questions that mystery shoppers completed as the final step in their evaluation of each CW:

- ▶ Verivox (Germany, <http://www.verivox.de/internet/dsl-tarifrechner.aspx>);
- ▶ Asesor ADSL (Spain, <http://www.asesoradsl.com>);
- ▶ PrizeWize (the Netherlands, <http://www.prizewize.nl>);
- ▶ Telepriser.no (Norway, [www.telepriser.no](http://www.telepriser.no));
- ▶ Broadband Choices (United Kingdom, <http://www.broadbandchoices.co.uk/>).

The first three comparison websites listed above are privately operated, while Telepriser.no is run by the Norwegian Post and Telecommunication Authority (NPT), and Broadband Choices is a privately run comparison website accredited by the UK national regulatory authority, Ofcom.

### 2.2.3 Internet service providers (ISPs)

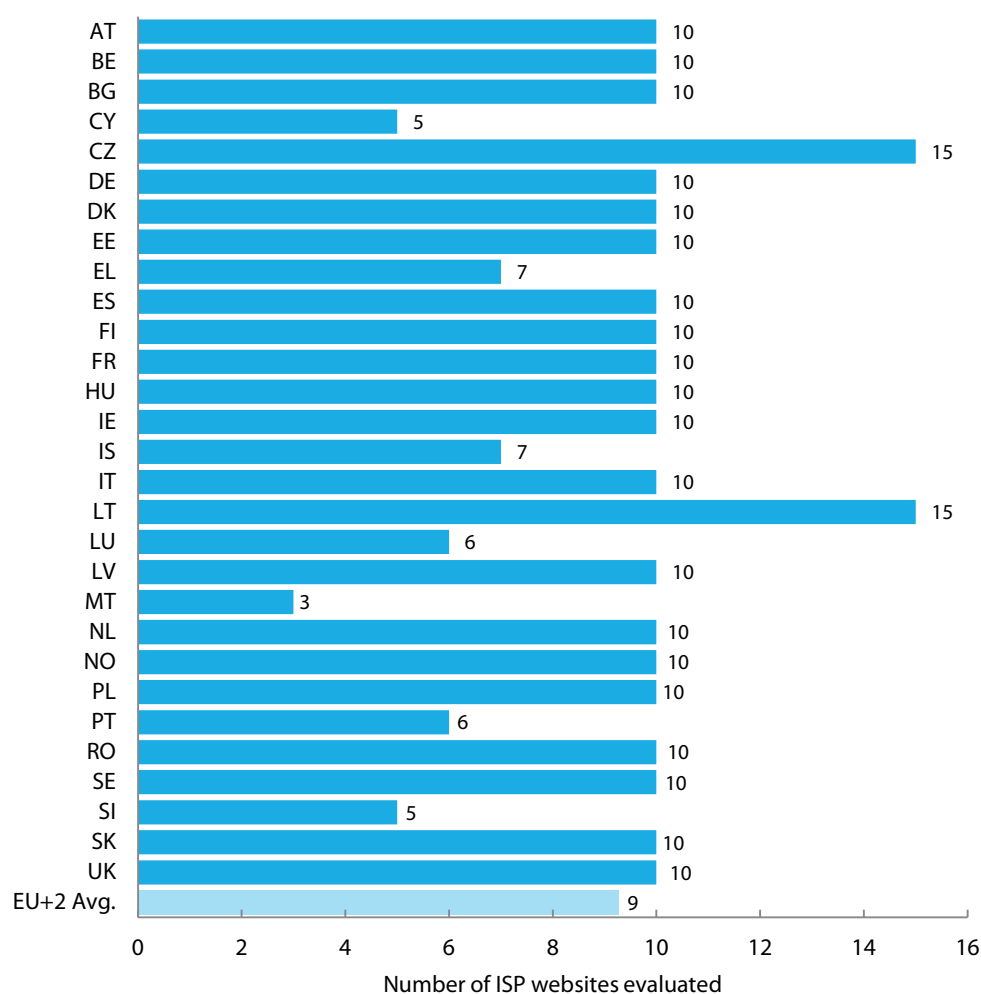
In the second part of the evaluation of comparison websites and Internet service provider websites we assessed up to 10 ISP websites per country, except for three cases, where the aim was to assess 15 ISPs (in the Czech Republic, Lithuania and Romania).<sup>16</sup> As expected, it was not always possible for mystery shoppers to identify 10 relevant ISPs, especially in less populous or geographically smaller countries. On average, 9 ISPs were assessed per country, for a total of 269.

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<sup>16</sup> The evaluation of an increased number of ISPs in these three countries was undertaken due to the significant fragmentation of their Internet service provision markets. This is evidenced by the number of ISPs which comprise 90% of market share – in these three countries 8 ISPs share 90% of the market, whereas in France, for example, the figure is 3 ISPs and in Spain it is 5 (Broadband Internet Access Cost (BIAC) database prepared for DG CONNECT, data as of 02/2011; available at: [https://ec.europa.eu/digital-agenda/sites/digital-agenda/files/study\\_broadband\\_access\\_costs.pdf](https://ec.europa.eu/digital-agenda/sites/digital-agenda/files/study_broadband_access_costs.pdf)).

**Figure 49.** [Please indicate the] country for which you are conducting the website evaluation.

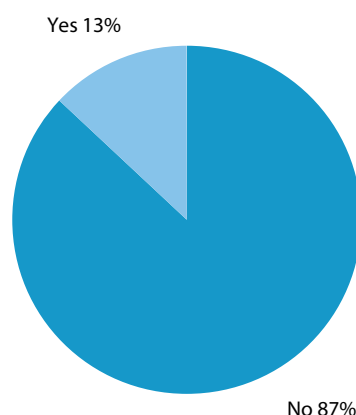
Source: Civic Consulting website evaluation, Question ISP2. (N=269)



Those countries where fewer than 10 ISP websites were assessed by mystery shoppers are Malta (3), Cyprus (5), Slovenia (5), Luxemburg (6), Portugal (6), Iceland (7) and Greece (7). In the case of Romania it was planned to assess 15 ISPs, but only 10 ISPs could be located which had functioning websites and sold Internet services to consumers. Besides the 10 Romanian ISPs included in the survey a further five were located, but the websites of three of these malfunctioned during repeated attempts to evaluate them and the other two provided Internet services only to businesses.

**Figure 50. Is this the incumbent ISP?**

Source: Civic Consulting website evaluation, Question ISP8. (N=269)



Most of the ISPs assessed in the exercise were non-incumbents (234 ISPs, or 87% of the total). In addition, 35 incumbent ISPs were evaluated (13%). In two countries more than one incumbent ISP was included in the exercise. These were Finland, where six incumbent providers were assessed, and Hungary, where two incumbent providers were evaluated.<sup>17</sup>

### **Transparency of ISP websites – assessing prominently advertised products**

Mystery shoppers were asked to identify the offer of the most prominently advertised product on the ISP websites which met the criteria of one of the five pre-specified products and then assess it.<sup>18</sup> On the ISP websites it appears that slower, standalone Internet offers were more often prominently advertised than faster double- and triple-play bundles. Standalone Internet with a connection speed of between 2 Mbps and 12Mbps (Product 1) was the most prominently advertised product on 105 ISP websites. Product 4 (triple play, 12Mbps to 30 Mbps) was the most prominently advertised product on 41 ISP websites, Product 2 (double play, 2Mbps to 12Mbps) on 40 and Product 3 (double play, 12Mbps to 30Mbps) on 36. The least advertised

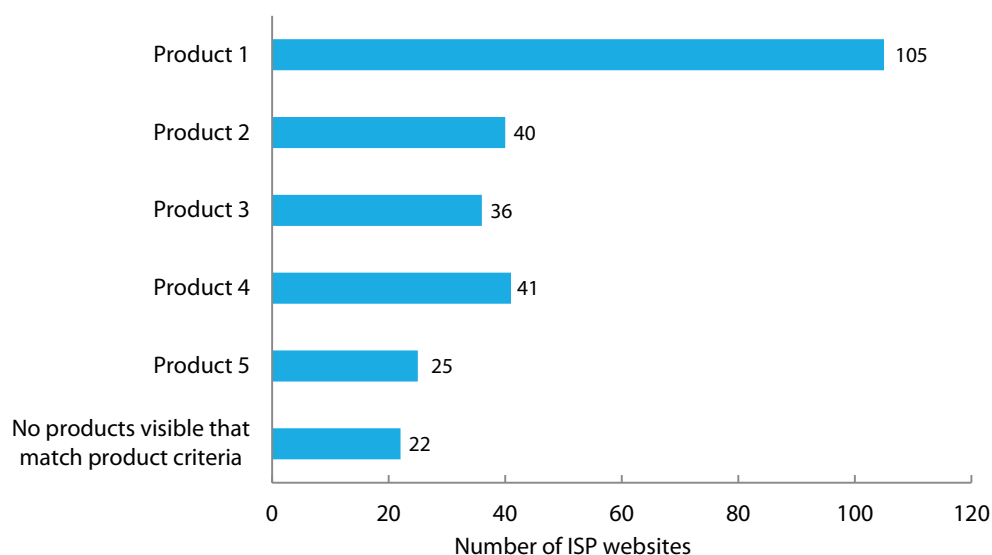
<sup>17</sup> In Finland, there are four telecom incumbents which provide broadband Internet service (please see the BIAC database, 2011). One of these is actually a group comprising 27 locally operating companies. During the website evaluation exercise we assessed the websites of each of these incumbent 'companies', including three locally operating companies from the 27-member group. Notably, the incumbent companies in Finland can also operate as new entrants outside of their own geographic operating areas. In Hungary, there are also multiple incumbent providers on the fixed telephony market. According to the National Media and Infocommunications Authority in Hungary, these are designated as having significant market power within their geographic areas, but they also provide services outside of those areas.

<sup>18</sup> Regarding the 'most prominently advertised product', the objective was to evaluate the product being advertised most heavily by the ISP on its own website. Using their own impressions of those websites, mystery shoppers were instructed to select the product that was highlighted in the largest advertisement or graphic on the home page, as long as it fell under one of the five pre-defined product categories. If several products were similarly advertised (e.g. identically sized advertisements in a column or row), mystery shoppers were told to select the one listed first, i.e. the one located at the top of a column or in the left-most position in a row. In cases where none of the advertised products matched the five product definitions, mystery shoppers indicated 'No products visible that match product criteria' and then proceeded with another product type.

product was high-speed triple play Internet (more than 30Mbps). This was the most prominently advertised product on only 25 ISP websites.

**Figure 51.** Please indicate now which of the following products is most advertised on the ISP website.

Source: Civic Consulting website evaluation, Question ISP9a Transparency of ISP website. (N=269)



In addition, there were products which did not correspond to any of the five specified categories. These were the most prominently displayed products on 22 ISP websites. For example, one such product was standalone Internet with an advertised speed above 12 Mbps. There were also various other types of bundles available, such as fibre-optic Internet and TV without a phone line, or Internet which came with both a fixed telephone and a mobile telephone package. Another possibility was fixed Internet, mobile Internet, fixed telephone and TV. There were also products available which were not advertised with a specific download speed. On one UK ISP website it was indicated that the speed of the Internet connection would depend entirely on location and a speed checker tool was offered so that the consumer could see what speed they would receive. On two other ISP websites mystery shoppers could not find information on download speed.

Dividing these results between those products which were most prominently advertised on ISP websites in EU15<sup>19</sup> and EU12<sup>20</sup> Member States yields substantial divergence. Whereas in the EU15 a bundle (Product 2, 3, 4 or 5) was the most prominently advertised product on 100 of 139 ISP websites, the opposite trend appeared in the EU12. On ISP websites evaluated in these countries, standalone Internet (Product 1) was the most prominently advertised product in the majority of

<sup>19</sup> The term 'EU15' is used throughout this report to refer to the so-called 'old Member States', i.e. those countries which joined the European Union prior to 2004. These countries are: Belgium, Denmark, Germany, Ireland, Greece, Spain, France, Italy, Luxembourg, the Netherlands, Austria, Portugal, Finland, Sweden, and the United Kingdom.

<sup>20</sup> The term 'EU12' is used throughout this report to refer to the so-called 'new Member States', i.e. those countries which joined the European Union in 2004 or afterward. These countries are: Bulgaria, the Czech Republic, Estonia, Cyprus, Latvia, Lithuania, Hungary, Malta, Poland, Romania, Slovenia, and Slovakia.

instances (59 of 113 websites), with a bundle being the most prominently advertised product in just over a third of instances (41 of 113 websites).<sup>21</sup>

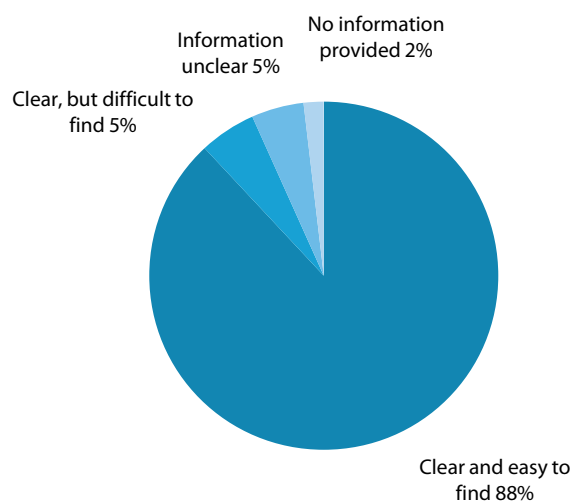
This divergence is especially visible across individual Member States. For example, among the 40 ISP websites evaluated in the relatively large markets of France, Germany, Italy and Spain, just 4 prominently displayed advertising for a standalone Internet product (3 websites in France and 2 in Italy). Conversely, this was the case for all 15 ISP websites evaluated in the Czech Republic and 11 of 15 websites evaluated in Lithuania. Estonia stands as something of an exception to this advertising trend in the EU12 Member States: of the 10 evaluated ISP websites in that country, 6 prominently advertised bundles (with 4 sites advertising high speed triple play bundles and 2 advertising low speed double play products), while just 4 prominently displayed advertising for standalone Internet.

*Transparency of technical information provided by ISPs*

Once mystery shoppers had identified the most prominently advertised products on the ISP website they were asked to click on it and assess the offer presentation of several aspects.

**Figure 52. Transparency of ISP website – Download speed**

Source: Civic Consulting website evaluation, Question ISP11. (N=268)

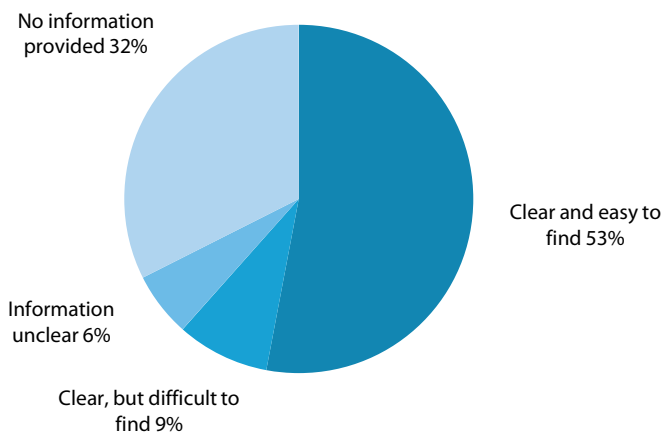


On the whole, the download speed of the selected offer was provided clearly and visibly on the ISP websites. In 88% of cases the mystery shoppers recorded that this information was clear and easy to find. On a small minority of ISP websites the information was either unclear (5%) or difficult to find (5%). Only 2% of ISP websites did not provide information on download speed.

<sup>21</sup> On 8 ISP websites originating in EU15 Member States there were no products visible that matched the 5 pre-defined products. This was the case for 13 ISP websites in the EU12 Member States.

**Figure 53.** *Transparency of ISP website – Upload speed*

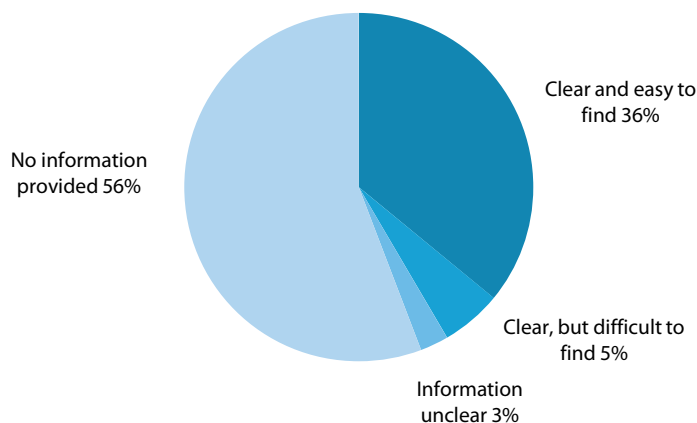
Source: Civic Consulting website evaluation, Question ISP12. (N=268)



On just over half of ISP websites (53%) the upload speed was clear and easy to find. One third of ISPs provided no information on the offer's upload speed (32%). On a further 9% of websites the information was clear, but difficult to find, while on 6% of websites the information relating to the offer's upload speed was unclear.

**Figure 54.** *Transparency of ISP website – Download limit/monthly download allowance*

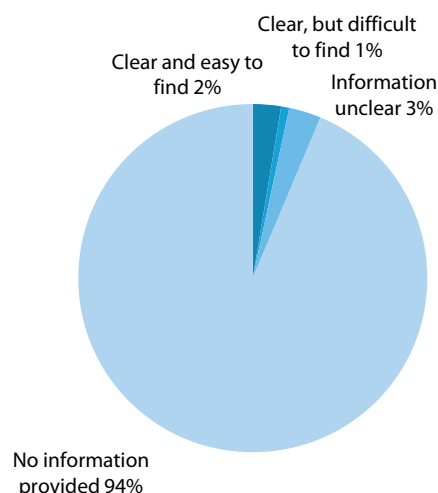
Source: Civic Consulting website evaluation, Question ISP13. (N=267)



The download limit or monthly download allowance of the prominently advertised offer assessed by mystery shoppers was less frequently provided than its upload speed. In 56% of cases there was no information offered about the download limit. Just over a third of ISPs provided this information in a way which was clear and easy to find (36%). On some ISP websites the information was provided, but it was unclear (3%) or difficult to find (5%). Notably, though, some ISP websites may not have provided this information simply because there was no download limit applicable to the assessed offer (i.e. the offer was for unlimited access).

**Figure 55. Transparency of ISP website – Blocking/throttling of specific websites/services**

Source: Civic Consulting website evaluation, Question ISP14. (N=268)



In the prominently advertised offers assessed by mystery shoppers, 94% of ISPs provided no information about the blocking or throttling of services. On 3% of ISP websites there was unclear information provided. Only on 2% of ISP websites was this information clear and easy to find. On an additional 1% of the ISP websites there was clear information provided that was difficult to locate. One example of a clear explanation about the blocking or throttling of services is given by a Maltese ISP, which explained that *'we reserve the right to reduce, suspend or terminate your service or restrict certain type of traffic on your Service'*. Another ISP, from Slovakia, also explained that it might reduce service provision under certain circumstances: *'[xxx] has the right to take measures for the temporary reduction or suspension of the service subscriber'*. On the whole, however, such clear information was rare.

The rarity with which the evaluated ISP websites provided information on the blocking or throttling of services cannot reliably be interpreted to mean that the vast majority of providers do apply blocking or throttling policies. On this point, a recent study on traffic management conducted by the Body of European Regulators for Electronic Communications (BEREC) is informative. BEREC's research,<sup>22</sup> based on responses submitted by 266 fixed-network providers (i.e. non-mobile providers), found that just 49 (or 18%) applied some level of restriction (blocked or throttled) on peer-to-peer traffic,<sup>23</sup> while just 2 did so for VoIP traffic and 10 did so for 'other specific traffic'. Other research has suggested that throttling may be more common: in the UK, Ofcom has reported that "all fixed ISPs use some form of traffic

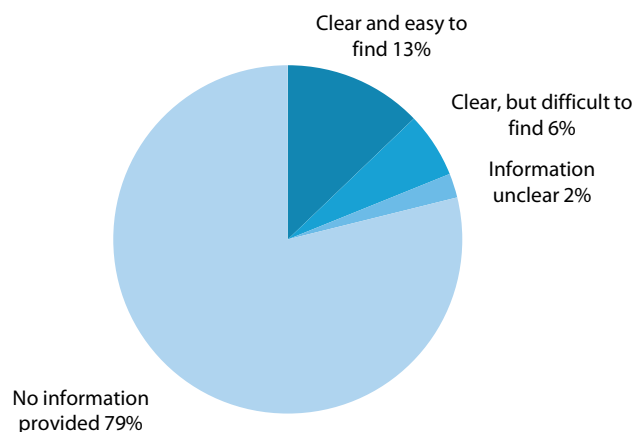
<sup>22</sup> BEREC (2012). 'A view of traffic management and other practices resulting in restrictions to the open Internet in Europe: Findings from BEREC's and the European Commission's joint investigation.' BoR (12) 30. Available at: [http://berec.europa.eu/eng/document\\_register/subject\\_matter/berec/reports/45-berec-findings-on-traffic-management-practices-in-europe](http://berec.europa.eu/eng/document_register/subject_matter/berec/reports/45-berec-findings-on-traffic-management-practices-in-europe).

<sup>23</sup> In 96% of cases these restrictions were technically, rather than contractually, enforced, and in 40 of the 49 cases the restrictions applied to all of an ISP's users, not just to a select group.

management", with most employing it in a minimal manner to restrict the behaviour of a small minority of heavy users.<sup>24</sup>

**Figure 56. Transparency of ISP website – Availability of online speed test**

Source: Civic Consulting website evaluation, Question ISP23. (N=265)



Almost four-fifths (79%) of ISPs included in the exercise did not appear to offer an online speed test when mystery shoppers assessed a prominently advertised offer. Just under one-fifth (19%) of the ISP websites did make such a service available, although it was not always easy to locate (13% easy to find, 6% difficult to find). On 2% of ISP websites mystery shoppers selected 'information unclear' for this question. In one of these cases, a tool was provided to check service availability in specific locations, but there was no tool to check the actual speed of that service. In the other cases it was due to the fact that a speed checker was available, but it was not functioning at that time. Some of the ISPs which did provide a link to a functioning speed checker did not offer this service themselves, but rather linked mystery shoppers to an external website.

#### *Transparency of price information provided by ISPs*

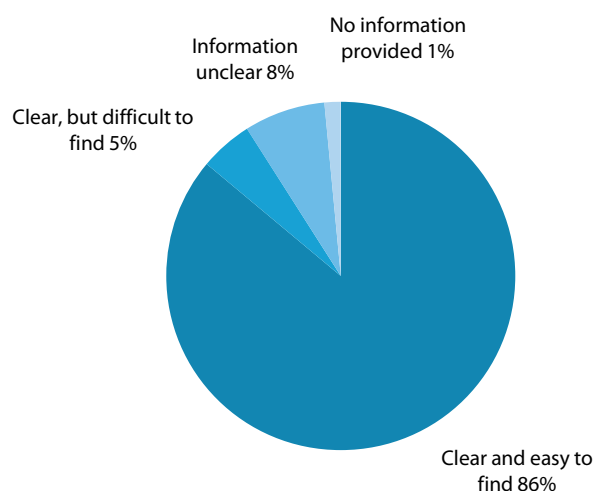
On 86% of ISP websites the mystery shoppers easily found the standard monthly price of the prominently advertised offer they assessed. However, on 14% of ISPs there was some difficulty involved, either because the information was unclear (8%), difficult to locate (5%) or not provided (1%).

<sup>24</sup> Klein, J., Freeman, J., Morland, R., and Revell, S. (2011). 'Traffic management and quality of experience', Technologia, Version 1. Document prepared for Ofcom.



**Figure 57. Transparency of ISP website – Standard monthly price**

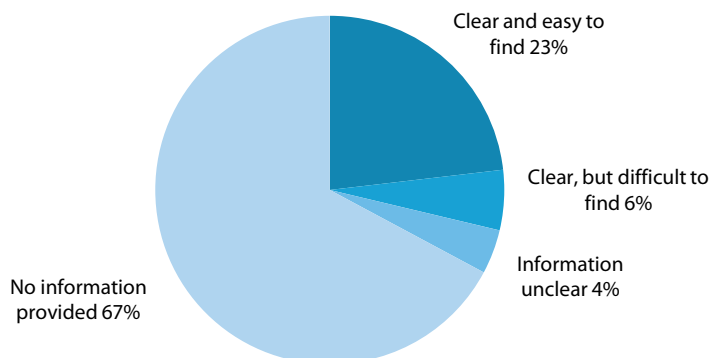
Source: Civic Consulting website evaluation, Question ISP15. (N=266)



One reason mentioned by mystery shoppers for lack of clarity in relation to the standard monthly price was that one could not always tell if the stated price would increase after a certain period of time (e.g. several months) or if there were any additional, unlisted costs. Where neither the absence nor existence of additional costs was specified by the ISP the consumer might assume none were applicable, but this was not actually stated. On some occasions, the lack of clarity was caused by confusing language used by the ISP. For example, the price was listed as 'from' a certain amount per month. On certain ISP websites, the mystery shoppers described the standard monthly price as unclear because the information provided on the offer page was contradicted by information on other parts of the website. For example, on one Polish ISP the price was listed as 39.99 zł per month, but when the mystery shopper started the order and specified desired factors, such as connection speed and contract duration, the price increased to 54.99 zł per month.

**Figure 58. Transparency of ISP website – Line rental**

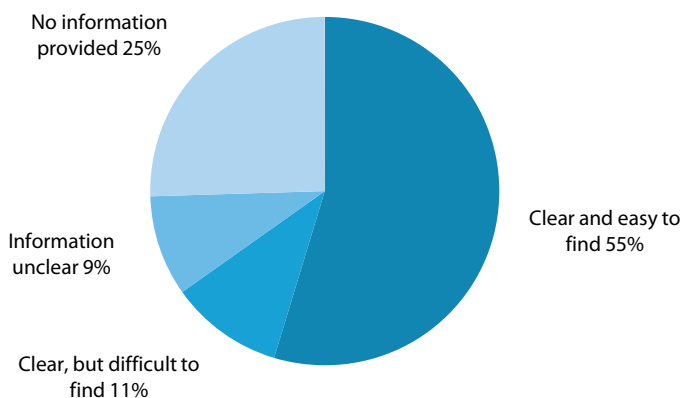
Source: Civic Consulting website evaluation, Question ISP16. (N=268)



On two-thirds of ISP websites (67%) there was no information provided about the line rental associated with the prominently advertised offer assessed by mystery shoppers. Only on 23% of ISP websites was this information clear and easy to find. In 10% of cases the information was either unclear (4%) or difficult to find (6%).

**Figure 59. Transparency of ISP website – Activation costs/ installation costs**

Source: Civic Consulting website evaluation, Question ISP17. (N=267)



On just over half of ISP websites (55%), information relating to activation and installation costs associated with the assessed offer was clear and easy to find, while on a further 11% of ISP websites the information was clear but difficult to locate. One quarter (25%) of ISPs gave no indication as to whether there were additional costs for activation and installation.

On 9% of ISP websites the information about activation and installation costs was unclear during mystery shoppers' assessment of a prominently advertised offer. On some ISP websites the activation and installation costs were not mentioned specifically on the offer page. This applied, for example, to one French ISP website,

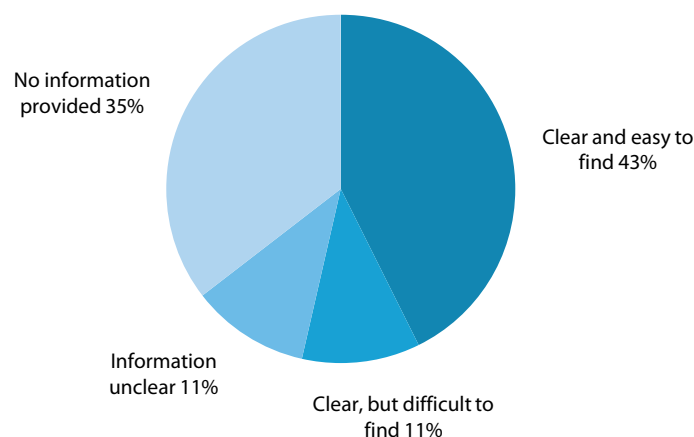
where the mystery shopper knew from careful study of other parts of the same website that activation costs did apply. On other ISP websites the lack of clarity was not caused by an absence of information, but rather by a confusing explanation offered by the ISP. One ISP, for example, claimed at the top of the advertised offer page that installation was free, but lower down on the page listed the various installation fees that were applicable, depending on the length of contract. As installation was free for those who subscribed to a two-year contract it could be assumed that this is what the advertisement at the top of the page referred to.

A couple of mystery shoppers noted that ISP websites they assessed stated that additional installation costs would be incurred if certain technical requirements were not fulfilled, but it was not explained what these requirements were. For example, one Austrian ISP explained that there would be no connection charge for people who wished to install the service themselves, *'if self-installation is technically possible'*, with no indication of what preconditions were necessary for self-installation. Another ISP indicated that the first 200m of optical fibre cable necessary for installation were free, but did not explain how much cable would typically be required.

In some cases ISP websites mentioned that additional activation or installation costs applied, at least under certain circumstances, but did not specify the actual cost. One Austrian ISP, for example, only stated: *'Costs for the activation and installation of the cable TV network connection in the house are not included'*. An Irish ISP explained that those who did not wish to install the service themselves would pay a fee, but did not clarify the amount.

**Figure 60. Transparency of ISP website – Additional costs and rebates**

Source: Civic Consulting website evaluation, Question ISP18. (N=265)



On one third of ISP websites (35%) there was no information provided about additional costs and rebates. Just over half of ISPs (54%) provided clear information, although this was not always easy for the mystery shoppers to locate (43% clear easy to find, 11% clear, but difficult to find). A further 11% offered unclear information about additional costs and rebates.

One of the additional costs listed by some ISPs was for equipment or the shipping of equipment. In some cases ISPs explained that additional charges would be added if the customer wished to pay in a certain way, for example with a paper invoice. Other examples are provided by an Irish ISP that required a 'standalone charge' of 7.75 Euro and a Polish ISP that listed 'additional one-off costs' as 19.90zł, without explaining further. One Dutch ISP required that new customers pay an extra charge for administration costs.

Sometimes mystery shoppers recorded that information on additional costs/rebates was unclear or difficult to find because it was listed on a separate page, such as a price list or detailed product description. Sometimes this was a separate PDF file which had to be downloaded. On some ISP websites the information was in small print at the bottom of the offer page.

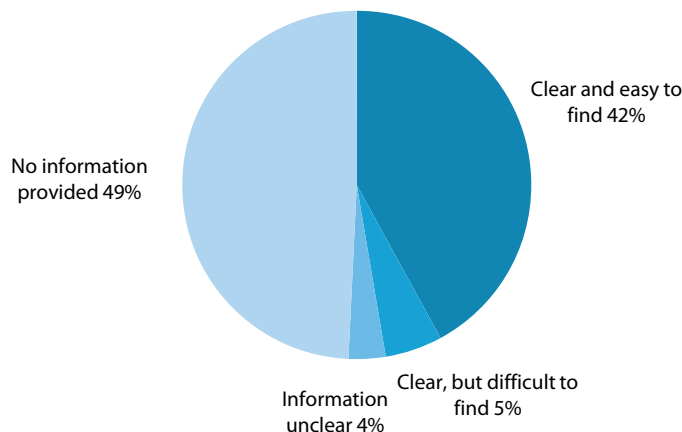
As well as additional costs, mystery shoppers also found information about rebates and bonuses. Typical examples of identified rebates include a certain number of months at reduced, or even zero, cost; a lump sum rebate off the first bill; and free activation or equipment costs. Products also sometimes came with additional services which were provided free of charge, such as anti-virus protection or access to online gaming services. In some cases there were rebates for particular groups of people, such as students or new customers.

#### *Transparency of the availability of additional online services*

While 49% of ISPs provided no information about additional online services in the prominently advertised offer assessed by mystery shoppers, almost as many (42%) made this information clear and easy to find on their website. A further 5% provided clear information that was difficult to locate, while 4% of ISP websites provided unclear information about the availability of additional online services.

**Figure 61.** *Transparency of ISP website – Availability of additional online services (email, personal website, personal storage, etc.)*

Source: Civic Consulting website evaluation, Question ISP22. (N=264)



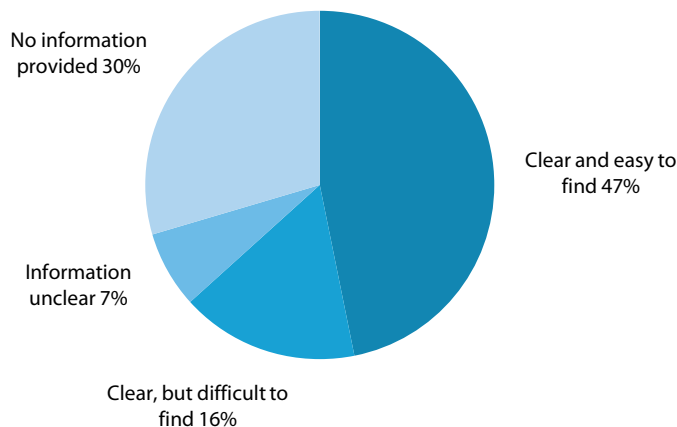
From the comments made by mystery shoppers it is clear that by far the most frequently offered additional online service was email. Other services which came up were the provision of a personal website, online storage (for photos, videos, music, etc.), a particular type of IP address (dynamic or static), and virus protection. Less frequently noted by some mystery shoppers were Web TV, parental control options, access to online game servers and various phone options (such as caller ID, a second telephone number, etc.). Some ISPs charged extra fees for particular services, but on most websites that offered these services, there was no indication of extra charges recorded by mystery shoppers. On some websites it was specified that they were free of charge.

#### *Transparency of contract information provided by ISPs*

Almost half of ISPs (47%) provided information on the contract duration of assessed offers that was clear and easy to find. A further 16% provided clear information that was difficult to locate, while on 7% of ISP websites the information provided was unclear. Sometimes information on contract duration was not provided in the main offer description, but located in small print at the bottom of the page, on separate pages or in PDF documents (such as a price list, terms and conditions, product description, etc.). On 30% of ISP websites the mystery shoppers could not find information on the contract duration of the assessed offer.

**Figure 62. Transparency of ISP website – Contract duration**

Source: Civic Consulting website evaluation, Question ISP19. (N=267)

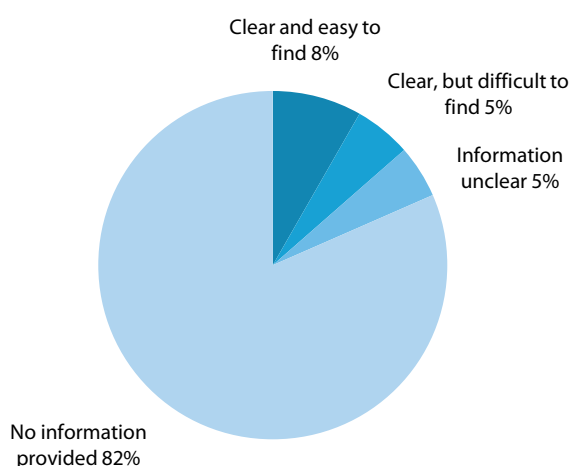


On some ISP websites there was an option to select from a variety of different contract lengths (e.g. no minimum period, 6 months, 12 months, etc.). In some of these cases, however, extra costs were incurred for choosing shorter contract duration or a contract with no minimum period, according to mystery shoppers' comments.

Only 18% of ISPs provided information on the automatic extension of contracts when mystery shoppers assessed a prominently advertised offer. In less than half of these cases was the information clear and easy to find (8% of total), while in the remaining cases it was either difficult to find (5%) or unclear (5%). On 82% of ISP websites the mystery shoppers could not find information about the automatic extension of contracts.

**Figure 63. Transparency of ISP website – Automatic extension of contract after initial duration expired**

Source: Civic Consulting website evaluation, Question ISP20. (N=266)



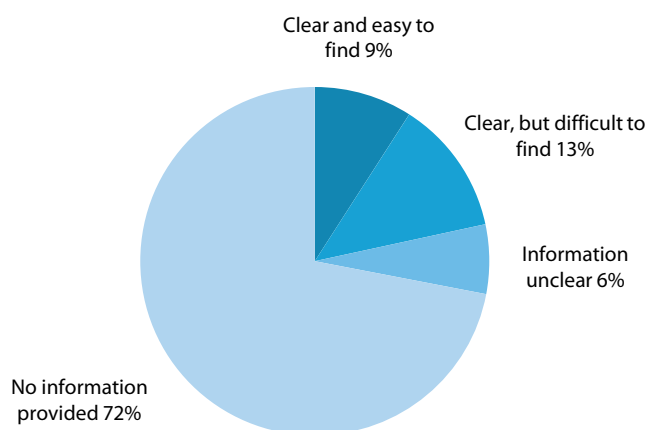
On those ISP websites where the information was provided that the contract would be automatically extended, this was sometimes found in a separate document, such

as the terms and conditions. One mystery shopper commented that the information provided in this document was difficult to understand. Some ISPs, however, made this information clear and easy to find. In particular, when ISPs explained that there was no automatic contract extension it appears from mystery shoppers' comments that this was advertised fairly prominently.

72% of ISPs provided no indication, when mystery shoppers assessed a prominently advertised offer, of whether fees would be incurred for early termination of the contract. Only on 22% of ISP websites could mystery shoppers find clear information (9% easy to find, 13% difficult to find). On a further 6% there was unclear information provided.

**Figure 64. Transparency of ISP website – Fee for terminating contract before it expires (termination fee)**

Source: Civic Consulting website evaluation, Question ISP21. (N=264)



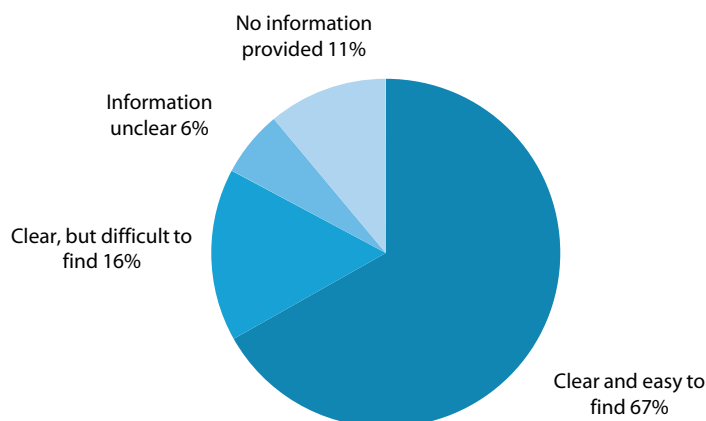
It is clear from the comments made by mystery shoppers that of those ISPs which provided some information on termination fees, the majority explained that there would be costs involved. However, some websites advertised that this was not an issue, as there was no minimum contract period. As identified by the mystery shoppers, the various types of penalties included paying the remaining months of the contract, paying a one-off fee and repaying the cost of the equipment. On some ISP websites it was mentioned that a fee was applicable, but the amount was not specified. Where mystery shoppers assessed the information on termination fees as being unclear or difficult to find, it was sometimes included on a separate page or document.

#### *Transparency of information on customer service hotline provided by ISPs*

When mystery shoppers assessed ISP websites, two-thirds (67%) of ISPs were described as providing clear and easily accessible information about the availability of a customer service hotline. A further 16% provided clear information which was difficult to find. Only 11% provided no relevant information, while another 6% offered unclear information

**Figure 65. Transparency of ISP website – Availability of customer service hotline**

Source: Civic Consulting website evaluation, Question ISP24. (N=262)



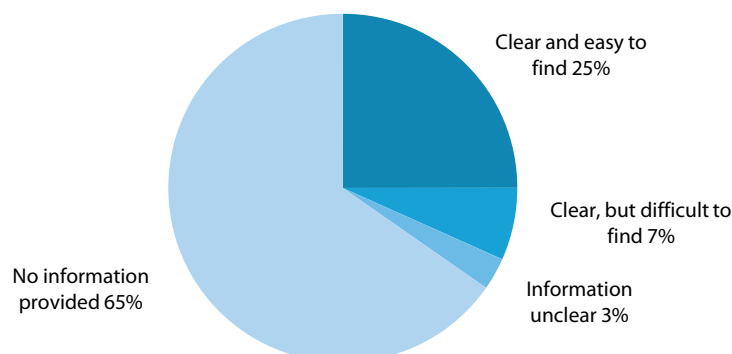
From the comments made by mystery shoppers, it is clear that most ISPs that indicated the availability of a customer service hotline also provided the telephone number with which they could be contacted. In around a third of the 89% of ISPs which offered at least some information on the availability of their customer service hotline, it was recorded by mystery shoppers that the ISP also provided the hours during which they could be contacted. In addition to a customer service hotline, some ISPs offered an email address, a web form, or the opportunity of live chat with a company employee. In a few cases one could leave a telephone number and the ISP would ring back.

On 65% of ISP websites the mystery shoppers could not find information about the price of the customer service hotline in the course of assessing a prominently advertised product. One quarter (25%) of ISPs did provide clear information that was easy to find, while a further 7% provided clear information that was nonetheless difficult to locate. Only 3% provided unclear information.



**Figure 66.** *Transparency of ISP website – Price of customer service hotline*

Source: Civic Consulting website evaluation, Question ISP25. (N=268)



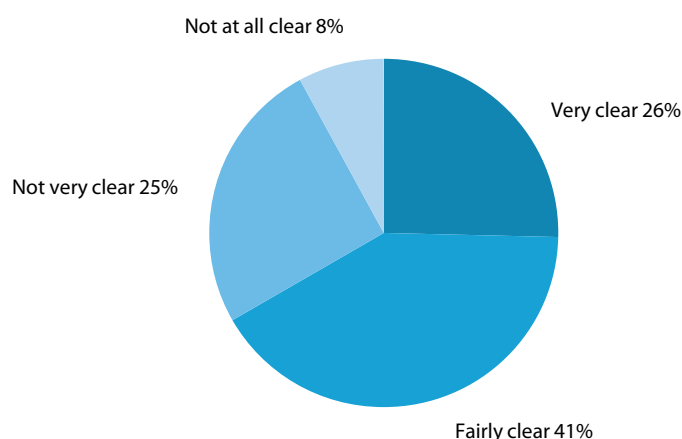
In most cases where the ISP provided information on the price of their customer service hotline this cost was recorded by mystery shoppers in the comments section. In more than half of these cases, mystery shoppers recorded that there would be no charge for the service (43 ISPs). According to the comments, a further 38 ISPs either specified particular rates at which the calls would be charged or listed that prices would be charged at the standard rate for landlines. For those ISPs that specified particular rates, these varied significantly between the different ISPs. For example, one Finnish ISP charged 0.90 Euro per minute, while one French ISP only charged 0.013 Euro per minute at particular times of the day.

#### *Overall clarity of offer information*

Following their assessment of a prominently advertised offer on an ISP's website, two-thirds of ISPs (67%) were considered by mystery shoppers to provide clear and understandable information regarding the offers on their website (41% fairly clear, 26% very clear). Analysis of their comments suggests that mystery shoppers tended to rate the ISPs positively when they saw that most relevant information was provided and that this was presented in a fairly understandable manner. It was important that information was concisely listed in one place.

**Figure 67.** *Transparency of ISP website – Overall, how clear did you find the information regarding this offer on the ISP website?*

Source: Civic Consulting website evaluation, Question ISP26. (N=264)



However, after evaluating the prominently advertised offer, mystery shoppers deemed 33% of ISPs to provide unclear information (25% not very clear, 8% not at all clear). One of the key issues identified by mystery shoppers was that sometimes not all the relevant information was provided, or it was difficult to find. On some ISP websites the relevant information was not provided on the offer page, but instead on another page of the website, such as the terms and conditions or a price list. On other ISP websites the information was on the offer page, but in small print that was difficult to locate. In both situations the information provided could be highly detailed and complex. In regard to one Belgian ISP, the mystery shopper commented that although the website was clear at the beginning, once one clicked on the offer page and went further in the process, one was overwhelmed with information. Moreover, the length and complexity of the information might put the consumer off from reading it at all, as another mystery shopper explained, *'Lots of information on purchase conditions etc. is provided in long PDF documents written in small letters which I would never read through'*.

Further problems were caused by unclear language or the provision of information which appeared to be self-contradictory. For example, one mystery shopper commented, *'The table with the different offers differs between "standard" contract and contracts for 1 and for 2 years, but it is unclear what the "standard" contract consists of'*. Further examples are offered by a Polish ISP, which advertised what appeared to be the same package on different parts of the website with a different price and a Maltese ISP where installation costs were listed as free on the offer page, but in the terms and conditions as costing 40 Euro.

### **Overall assessment of ISP websites**

In addition to assessing the clarity of offer information in regard to a prominently advertised product, mystery shoppers were also asked to provide an overall

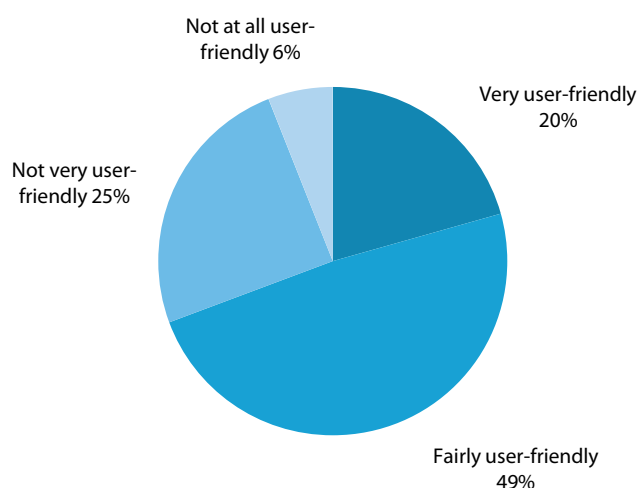
assessment of the ISP website. This assessment was made after the mystery shoppers had both assessed the offer of the most prominently advertised product and searched for the prices of five specific products. If possible, mystery shoppers searched for this price information in six different locations.

#### *User-friendliness and ease of comparison*

Just over two thirds of ISPs (69%) were assessed as user-friendly by mystery shoppers, as compared to the 52% of CWs that received this assessment. 31% of ISPs were considered not to be user-friendly, whereas this was the case for 48% of CWs.

**Figure 68.** How would you rate the user-friendliness of the ISP website?

Source: Civic Consulting website evaluation, Question ISP147. (N=267)

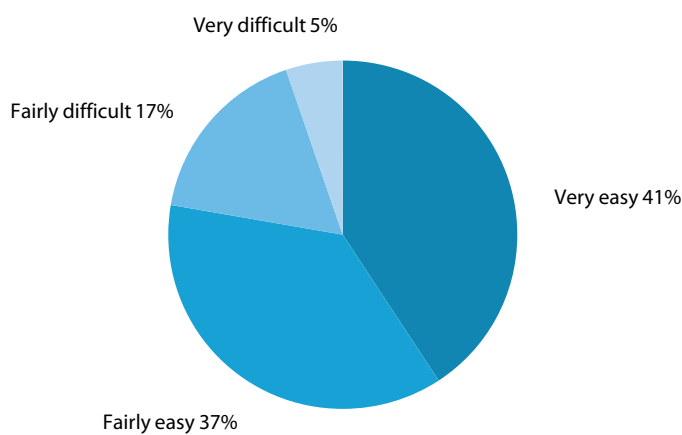


Mystery shoppers tended to comment that it was user-friendly when it was easy to find particular products and the relevant information was presented in a clear and easily understandable manner. For example, some mystery shoppers indicated that it was user-friendly when there was a possibility to search for particular products available in a given location, rather than having to first click on one product before being able to check local availability. Mystery shoppers also commented that it was important to be able to search by product specifications, as this enabled them to more easily find the products for which they were looking. On some ISPs the mystery shoppers also suggested that it was useful to have all the offers displayed concisely on one page with details of their basic characteristics (download speed, price, etc.). By contrast, on some ISPs it was difficult to find the necessary information about the offers, as it was spread across several pages or included in a separate document that needed to be downloaded. In a few cases mystery shoppers recorded that it was hard to find the correct offer because the ISP seemed to be heavily advertising certain products or because there were simply too many different offers available. For example, one mystery shopper commented, *'The aggressive promotion of certain products makes it difficult to find and compare the other products on offer'*.

On 78% of ISP websites it was easy to compare the technical aspects of different offers, according to mystery shoppers. As might be expected given that this involved the comparison of often similarly presented offers from the same provider, this percentage is higher than the 54% of CWs which were assessed as enabling easy comparison of the technical aspects of different providers' offers. However, nearly a quarter (22%) of CWs enabled very easy comparison of offers' technical aspects, according to mystery shoppers, which suggests that it is possible for CWs to develop clear comparisons of technical information presented by different providers.

**Figure 69.** Did you find it easy to compare the technical aspects of different offers listed on the ISP website (speed, download limit, etc.)?

Source: Civic Consulting website evaluation, Question ISP148. (N=265)



However, problems did occur with the comparison of the technical aspects of offers on the ISP websites. On over a fifth of ISP websites (22%) mystery shoppers considered it difficult to compare these aspects. One issue highlighted in the mystery shoppers' comments was the lack of relevant technical details. Generally, download speed appears to have been provided. Only one mystery shopper indicated that this was missing and Figure 52 shows that on 88% of ISP websites the download speed was clear and easy to find; only 2% of evaluated ISP websites provided no information on download speed. More frequently missing was information on the upload speed and download limit, as evidence by the findings shown in Figure 53 and Figure 54, as well as several comments made by mystery shoppers. Ten mystery shoppers commented that download speed was the only technical information provided, while a further ten mystery shoppers made the general comment that there was insufficient information on the technical aspects of offers.

Besides the question of which technical information was provided, there was also the issue of how it was presented. Mystery shoppers commented on three ISP websites that the presence of only a few offers enabled an easy comparison. In addition, some websites offered overview pages where all the offers from the ISP were displayed on one page along with a summary of their main characteristics – 23 mystery shoppers indicated that this enabled an easy comparison of the offers. A further 28 mystery shoppers specified that the technical information was easy to compare because the

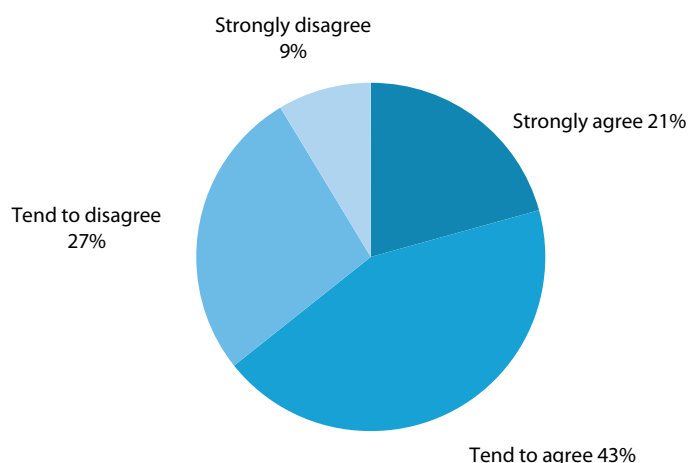
products were arranged in a table or list. By contrast, other websites provided no overview page but listed the offers individually, on separate parts of the website. This was recorded by eight mystery shoppers. Five mystery shoppers recorded that it was necessary to download a separate PDF document to acquire information on the technical aspects of offers.

*Usefulness in allowing the consumer to make an informed choice*

64% of ISPs were deemed by mystery shoppers to be useful in allowing them making an informed choice. On 36% of ISP websites the mystery shoppers did not think that they were being helped to make an informed choice. As in other respects, the ISP websites were rated more highly in this regard than the CWs, of which only 41% were considered to be helpful in this way, versus 59% which were not (see Figure 39).

**Figure 70.** Indicate your level of agreement with the following statement: 'I found this ISP website to be useful in allowing me to make an informed choice'.

Source: Civic Consulting website evaluation, Question ISP149. (N=266)



The key issue here appeared to be the absence of vital information about the offers. On around a fifth of ISP websites mystery shoppers commented that the lack of sufficient information hindered them from making an informed choice. Most frequently, mystery shoppers mentioned that information on speed, availability and contract terms was not provided or unclear. In addition, they recorded insufficient information on technical aspects and additional services. Regarding speed, four mystery shoppers commented that the download speed was unclear, as it was only advertised as 'up to' a certain speed. On seven ISP websites the mystery shoppers commented that the relevant information was provided, but was difficult to locate.

For these reasons, some mystery shoppers commented that the ISP websites were helpful in providing a general impression of what products the ISPs were offering, but that they would have to get in touch with the ISP, possibly by calling them, to be sure about the details of a specific offer and whether it was available for them. This was explained by one Lithuanian mystery shopper: *'it provides a general impression of what the company has on offer, but for any more specific details the customer has to call the*

company directly and clarify those details'. This is similar to what some mystery shoppers commented about CWs – i.e. they were good for getting a basic overview, but did not provide enough clarity and detail to make a truly informed decision. In some cases the mystery shoppers even noted that they thought they were being misled by the ISP websites, due to missing or hidden information, particularly about extra costs or contract terms. One mystery shopper explained their assessment of an Irish ISP in this way: 'I feel that the whole structure of the website tends more towards misleading the consumer than helping them to make an informed decision'.

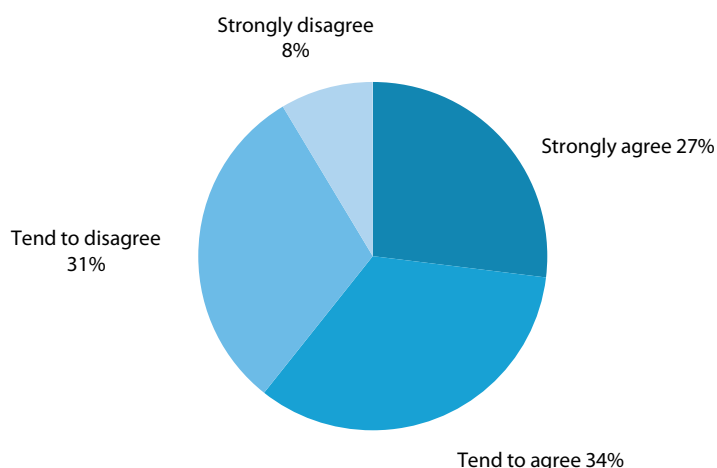
An additional issue, pointed out by three mystery shoppers, is that the ISPs tend to assume a certain level of technological knowledge. Even if all the relevant technical details are clearly presented, the consumer does not necessarily understand the terminology and what it entails. Therefore, one mystery shopper suggested that it would be easier to make an informed choice if the ISPs provided general information about broadband technology.

#### Clarity and understandability of price information

When assessed by mystery shoppers on the overall clarity of price information, 61% of ISPs were deemed by mystery shoppers to provide clear and understandable price information (34% tend to agree, 27% strongly agree). This is significantly higher than the proportion of CWs, i.e. 46%.

**Figure 71.** Indicate your level of agreement with the following statement: 'This ISP website provided clear and understandable price information'.

Source: Civic Consulting website evaluation, Question ISP150. (N=267)



One major problem with the clarity and understandability of price information was that important price components, such as line rental or activation fees, could be difficult to find. This sometimes also applied for other additional costs, for example extra charges for a paper invoice and fees for early termination. On certain ISP websites these were listed separately beneath or next to the main price, while on others they were only found in the small print at the bottom of the page or in a separate document entirely, such as the terms and conditions or a price list. Some

mystery shoppers recorded that there was no information on these price components anywhere on the ISP website. On one Romanian ISP website there was no price information of any sort on the ISP website, not even the standard monthly price.

Sometimes the price information was provided and easy to find, but it was unclear or contradictory, according to mystery shoppers. For example, one mystery shopper commented that additional costs were listed, but it was not specified under which conditions they would apply. For complicated double- and triple-play bundles the price information could be particularly unclear, as there were more price factors involved (for example, relating to the different TV channels). However two ISPs managed to minimise this by providing a running total price, which increased every time new bundle elements were added. The clarity of prices was also improved, according to eight mystery shoppers, where it was displayed in table form.

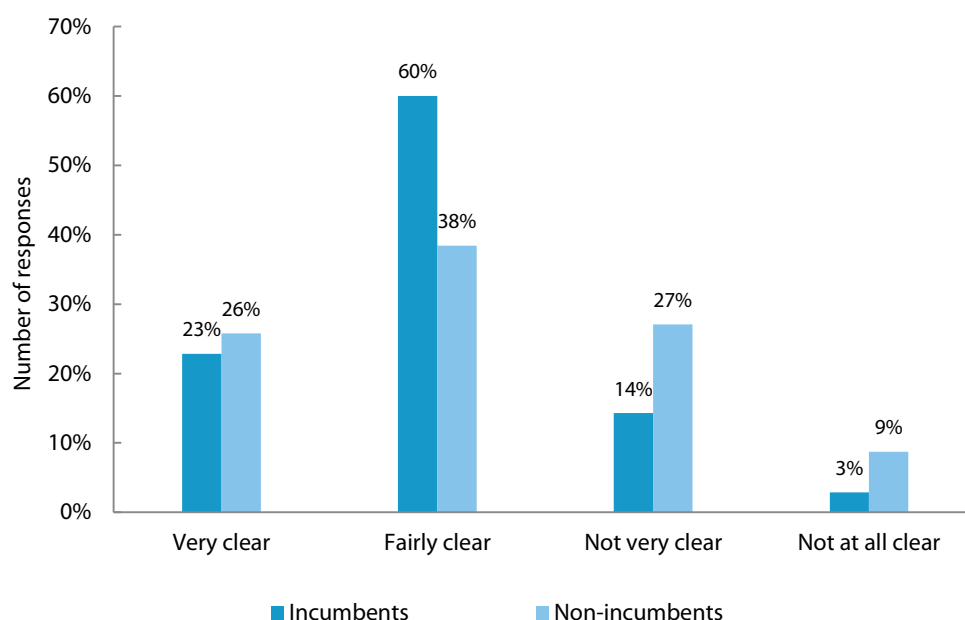
### 2.2.4 Comparative assessment: incumbent ISPs and non-incumbent ISPs

#### Overall clarity of offer information

The following graph again presents the results of the mystery shoppers' assessment of the overall clarity of the information on the ISP website relating to the prominently advertised offer, but in this instance, the results are presented separately for incumbent providers and non-incumbent providers.

**Figure 72. Transparency of ISP website – Overall, how clear did you find the information regarding this offer on the ISP website?**

Source: Civic Consulting website evaluation, Question ISP26. (N=264: 35/229)



On 83% of incumbent provider websites this information was assessed as clear (60% fairly clear, 26% very clear). A lower share (64%) of non-incumbent providers was assessed as providing clear information (38% fairly clear, 26% very clear). In addition,

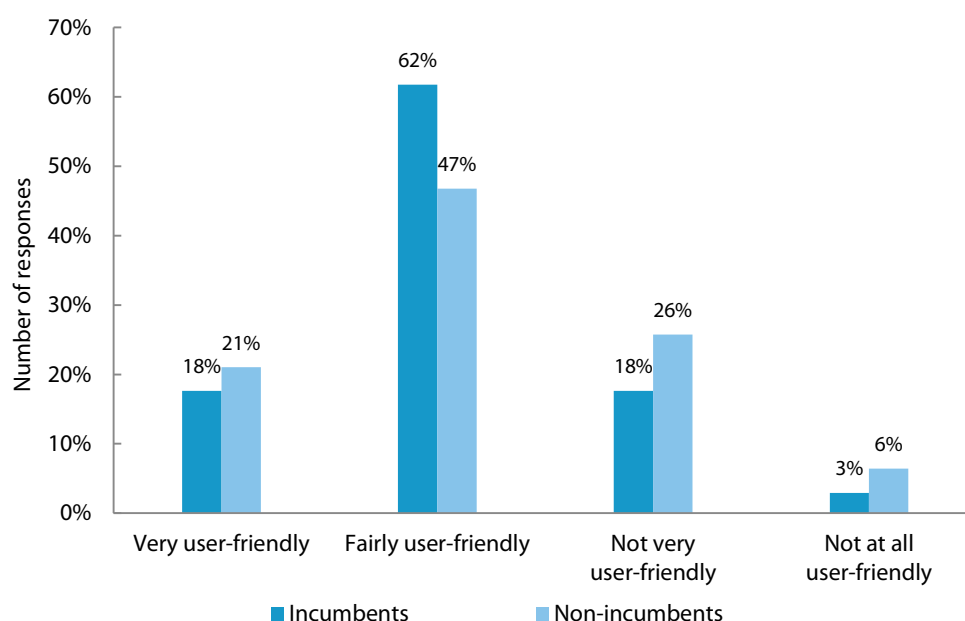
a higher share of these websites was assessed as providing information that was not at all clear (9% compared to 3%).

*Overall assessment of ISP websites*

Of the incumbent ISPs included in the survey 80% were considered to be user-friendly (62% fairly user-friendly, 18% very user-friendly) by mystery shoppers. Only 3% were described as not at all user-friendly, while a further 18% were considered not very user-friendly.

**Figure 73.** How would you rate the user-friendliness of the ISP website?

Source: Civic Consulting website evaluation, Question ISP147. (N=267: 34/233)

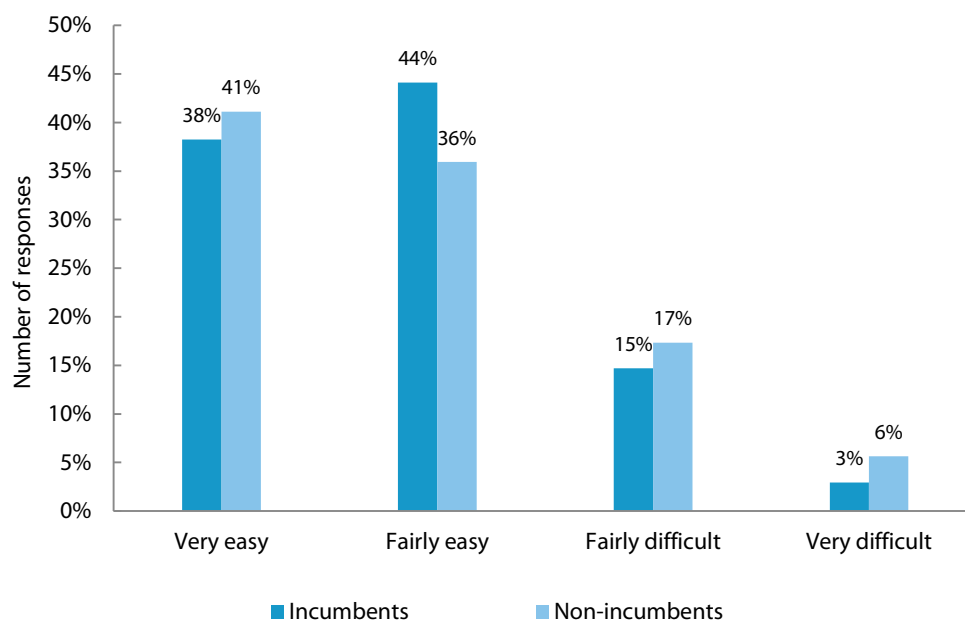


There was a fairly similar pattern on the non-incumbent websites, although these did appear to be slightly less user-friendly. 68% of non-incumbent ISPs were described as user-friendly, which is 12% less than the proportion of incumbent ISPs. Likewise, a higher percentage of non-incumbent ISPs were assessed as not at all user-friendly (6% compared to 3%). However, a slightly larger share of the non-incumbent websites were described by mystery shoppers as very user-friendly (21% compared to 18%).



**Figure 74.** Did you find it easy to compare the technical aspects of different offers listed on the ISP website (speed, download limit, etc.)?

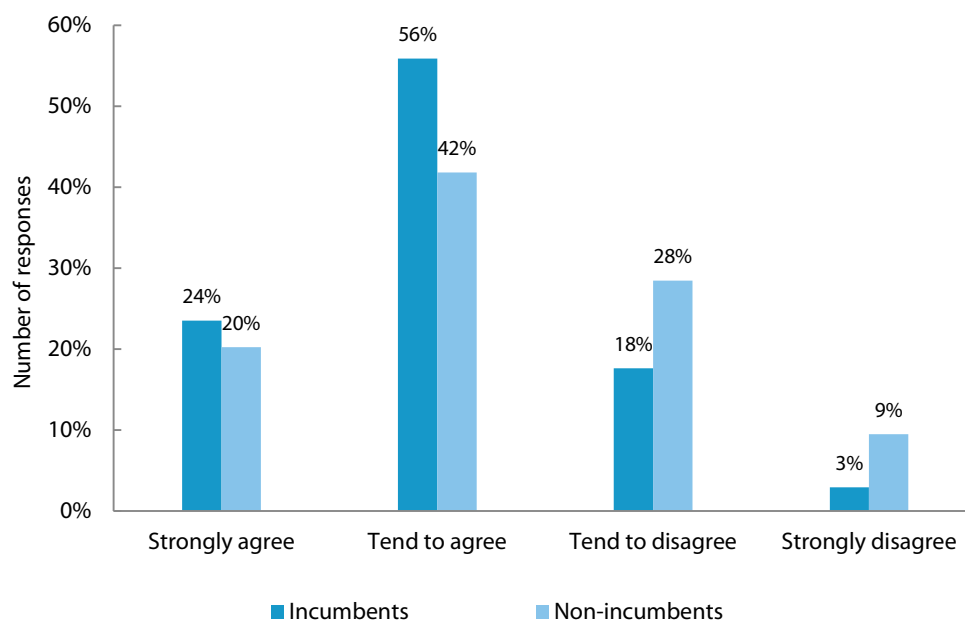
Source: Civic Consulting website evaluation, Question ISP148. (N=265: 34/231)



The incumbent ISPs performed well when assessed on the ease of comparing the technical aspects of offers. More than four-fifths of incumbent websites (82%) enabled an easy comparison of these aspects, according to mystery shoppers. Only on 3% of incumbent providers was such a comparison very difficult, while on a further 15% it was fairly difficult. The non-incumbent ISPs performed less well than the incumbents, but only marginally. Just under four fifths (77%) of non-incumbent ISPs made it easy for the consumer to compare the technical aspects of offers, only 5% less than the share of incumbents which did so. On 41% of non-incumbent ISP websites the comparison of technical aspects was described as very easy, which was the case for only 38% of incumbents. Likewise, on a higher percentage of non-incumbent ISP websites the comparison of the technical aspects was described as very difficult (6% compared to 3%).

**Figure 75.** Indicate your level of agreement with the following statement: 'I found this ISP website to be useful in allowing me to make an informed choice'.

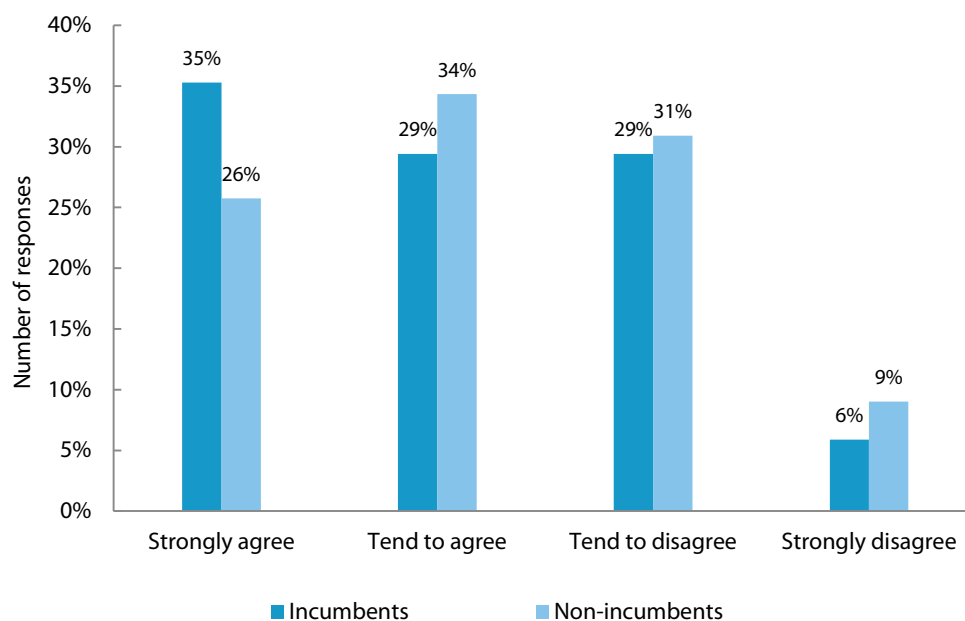
Source: Civic Consulting website evaluation, Question ISP149. (N=266: 34/232)



In four-fifths of cases (80%) the mystery shoppers assessed that the incumbent ISPs were useful in allowing the consumer to make an informed choice. Of those who disagreed with this only a small number did so strongly (3% of total). In almost a quarter of cases (24%) the mystery shoppers strongly agreed that the ISPs were helpful to the consumer. In contrast, 62% of non-incumbent ISPs were deemed by the mystery shoppers to be useful in allowing the consumer to make an informed choice. In addition, a higher share of mystery shoppers strongly disagreed that this was so in the case of the non-incumbent ISPs (9%). On 20% of non-incumbent ISP websites the mystery shoppers strongly agreed that they were being helped to make an informed choice, whereas this was the case for 24% of incumbents.

**Figure 76.** Indicate your level of agreement with the following statement: 'This ISP website provided clear and understandable price information'.

Source: Civic Consulting website evaluation, Question ISP150. (N=267: 34/233)



On 64% of incumbent ISP websites the mystery shoppers agreed that the price information was clear and understandable. More than half of these strongly agreed that this was the case (35% of total). Only 6% strongly disagreed. As in other aspects, the non-incumbent ISPs performed less well than the incumbents, although the differences between the groups were fairly small. On 60% of non-incumbent ISP websites the mystery shoppers agreed that the price information provided was clear and understandable, which is 4% lower than the corresponding share of incumbent ISPs. A higher percentage of mystery shoppers (9% compared to 6%) strongly disagreed that price information was clear and understandable on non-incumbent ISP websites, while a lower percentage strongly agreed (26% compared to 35%).

## 3 SWITCHING EXERCISE

*This section of the report describes the methodology of the switching exercise and presents its results.*

### 3.1 METHODOLOGY FOR IMPLEMENTATION

#### 3.1.1 Aim of the exercise

To better understand the consumer experience of switching Internet service provider (ISP) and the accessibility and helpfulness of providers' customer service, participants in six countries across Europe (Bulgaria, Germany, Poland, Spain, Sweden, and the United Kingdom) switched their ISP.

In each of these countries, participants in the switching exercise tested the customer service of the losing and the gaining providers, tried to negotiate a new tariff with their current provider, searched for a new provider, and switched their provider. Finally, participants were interviewed during a focus group during which they discussed their experiences.

#### 3.1.2 Step-by-step methodology

This section summarises the tasks implemented by participants in the switching exercise for each of the main steps.

##### ***Step 1: Contacting customer service of the old ISP***

In a first step, participants contacted their provider through (predefined) requests by phone and similar requests by email.

For each request participants were provided with an email template<sup>25</sup> and instructions of what to say on the phone. They were also given a questionnaire for both the telephone and email enquiries, in which they documented the time needed for each request, the type of hotline (for paid hotlines: price per minute, if indicated)<sup>26</sup> and the response of the ISP.

In case a provider replied comprehensively and – in a participant's opinion – satisfactorily to two requests regarding technical problems (for the purpose of this exercise participants reported experiencing a problematically slow Internet connection), further requests regarding these problems were not required.

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<sup>25</sup> Participants changed the wording of the emails slightly to avoid identical mails being sent to the same ISP from different consumers.

<sup>26</sup> If several alternative hotlines were provided, participants were recommended to choose the cheapest.

**Step 2: Switching the Internet provider**

In a second step, while they were testing the customer service of the old provider, participants in the switching exercise identified a new ISP based on a search conducted by them. The participants then switched their provider, using the provided email and call templates. Participants were given a questionnaire to document the switching process.

**Step 3: Contacting the customer service of the new ISP**

In a third step, once their new Internet connection was operational, participants contacted their new Internet provider through (predefined) requests by phone and similar requests by email.

**Step 4: Focus group**

Finally, a focus group exercise was conducted in each country to explore the understanding and preferences of participants regarding offers and bills.

**3.2 IMPLEMENTATION OF FIELDWORK**

The switching exercise was implemented by six consumer organisations located in Bulgaria, Germany, Poland, Spain, Sweden, and the United Kingdom.<sup>27</sup> These organisations are:

- ▶ Active Consumers, Bulgaria;
- ▶ Verbraucherzentrale Nordrhein-Westfalen, Germany;
- ▶ Association of Polish Consumers, Poland;
- ▶ MAG (Estudios de Consumo), Spain;
- ▶ Swedish Consumers Association, Sweden;
- ▶ Consumer Focus, United Kingdom.<sup>28</sup>

At least 10 participants switched their ISP in Bulgaria, Germany, Poland, Spain and the United Kingdom. In Sweden, however, it was only possible to recruit one consumer who actually switched her ISP. Two other participants in this country started the exercise but eventually decided to stay with their ISP. It proved particularly difficult to find participants in Sweden willing to switch their ISP. The Swedish Consumers

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<sup>27</sup> The choice of countries for the switching exercise was influenced by several factors. Geographically, the countries were selected so as to include Member States from different areas of Europe (e.g. the north and south, as well as centrally located countries like Germany and Poland). Country selections were also designed to include both EU15 and EU12 Member States.

<sup>28</sup> The switching exercise was implemented in the United Kingdom with the help of a sub-contractor.

Association was in contact with many potential participants but had very significant difficulties to identify a sufficient number of consumers who agreed to switch their ISP. The difficulty of recruiting participants in Sweden may be explained by a combination of several factors. Many potential participants had bundled products (covering for example all the mobile phone subscriptions of a household, Internet access, and fixed phone calls). These participants found it too complex and time consuming to compare new offers and preferred not to switch. Several potential participants had contracts with long minimum contract periods and, because of the high termination fees, they also decided to stay with their current providers. Other potential participants were convinced not to switch by their old providers via counter offers once they had revealed that they were considering switching. The difficulties experienced by the Swedish Consumers Association to recruit participants in Sweden highlight the obstacles faced or perceived by consumers when they consider switching their ISP in this country. These obstacles are further explained where relevant in the sections below. In response to the lower number of switchers in Sweden, additional participants were recruited in other countries, where possible. As a result, a total of 14 participants switched their ISP in Bulgaria and 11 in the United Kingdom. In the other countries covered by the exercise (Germany, Spain, and Poland), 10 participants switched their provider, as initially envisaged in the methodology.<sup>29</sup>

### 3.3 RESULTS OF FIELDWORK

This section of the report presents the results of the switching exercise. It describes the experience of the participants with the customer service of their old and new providers, comparing offers, and the switching process. It also presents their views concerning the clarity and understandability of bills and offers.

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<sup>29</sup> Overall, 38 of the participants in the switching exercise switched from a new entrant provider to another new entrant provider; 10 switched from a new entrant to the incumbent provider; and 8 switched from the incumbent to a new entrant provider.

### 3.3.1 Overview of number of participants and key results of fieldwork

The following table summarises the information presented above on the number of participants in the switching exercise in each country.

**Table 2.** Overview of participants in switching exercise

Country	Participants who started the exercise	Participants who switched their ISP	Participants who did not switch their ISP
Bulgaria	14	14	0
Germany	10	10	0
Poland	10	10	0
Spain	10	10	0
Sweden	(a)	1	2
United Kingdom	12	11	1

Source: Switching exercise.

Note: (a) The implementing organisation contacted many potential participants but experienced significant difficulties in identifying a sufficient number of consumers who agreed to switch their ISP.

### 3.3.2 Customer service of Internet service providers

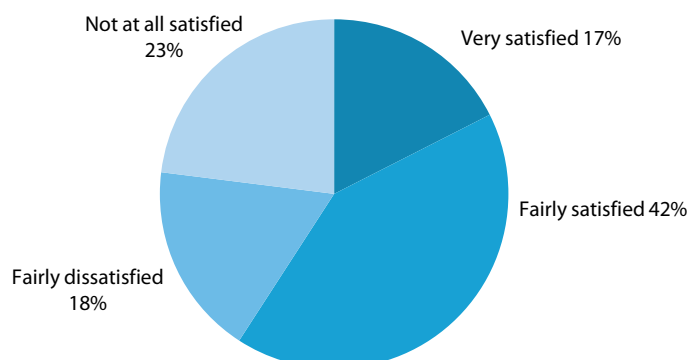
#### Overall experience of participants with customer service

##### Satisfaction with customer service

Participants were more often satisfied than dissatisfied regarding their contacts (by phone and email) with the customer service of their ISPs. They indicated that they were satisfied for more than half of their contacts, but fairly dissatisfied for almost one out of five contacts, and not at all satisfied for almost one out of four contacts (see figure below).

**Figure 77.** Overall satisfaction of participants with customer service of their ISPs

Source: Switching exercise. (N=655; N indicates the total number of times participants contacted their ISPs, by phone and email)

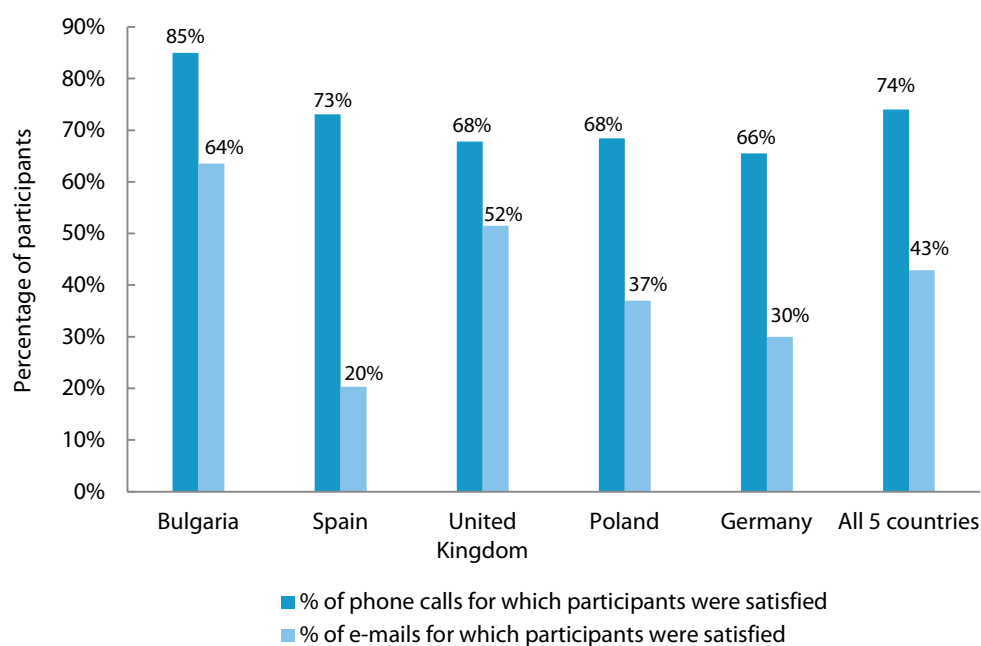


Satisfaction with the customer service varied significantly according to the mean of communication used to contact the provider. The figure below indicates that

participants in the five countries were satisfied in three-fourths of cases when communicating with their ISP by phone but in less than half of cases when corresponding via emails. Participants in Germany and Spain are those who most often indicated that they were not at all satisfied when communicating by email with their ISP (for 58% and 74% of their emails, respectively).

**Figure 78.**  
Satisfaction of participants with customer service, by mean of communication

Source: Switching exercise.



The high percentage of emails which were never acknowledged by ISPs (69% of emails) and the relatively low number of responses addressing the issues raised (57% of emails) are factors contributing to the overall dissatisfaction of participants when communicating with the customer service of their providers by email (see Figure 81 and Figure 82 below, respectively).

During the focus group discussion, several participants in Germany indicated that they always got the same answer to their emails and wondered whether these were really read. Similarly, one participant in Poland complained about the fact that responses were often standardised without fully addressing the issues raised:

*"I have a feeling that everything works automatically, like in some kind of machine. When something non-standard happens, a human factor, then the entire system collapses." (one participant in Poland)*

Participants also voiced some disappointment concerning phones calls with providers. For example, several participants in the United Kingdom felt frustrated because they had to provide the same information several times. Three participants in this country had to explain their problem each time they called, leading to repetitive and time consuming conversations. In other cases, participants had to



enter their details manually using the phone handset (such as account details, phone number) and then had to provide this information again to the customer services representative once the phone was answered. One provider, however, was highlighted as having an excellent system, where both customers and customer services representatives have access to an online portal, on which communications and actions taken are all logged and visible for both sides to see.

In Poland, four participants were of the opinion that the agents who took their calls demonstrated a lack of competence. Similarly, participants in Spain questioned the technical knowledge of those answering their calls and believed that their ISPs did not have thoroughly trained staff able to answer their queries. Participants in this country concluded that one has to be lucky to obtain good customer service, as reflected in the comments of the following participants:

*"It depends very much on the person who answers your call. Some people who attend to you have no idea and appear to be in a hurry." (one participant in Spain)*

*"Of all the queries I made I only came across one friendly and clear woman who answered all my queries. Also she gave me her contact number just in case the problem continued so that I could locate her again." (another participant in Spain)*

In Sweden, a participant found out during the exercise that the new modem that would have allowed her to receive the speed to which she upgraded her contract (and for which she paid a higher price) had actually never been sent to her. When this participant asked her provider why she had not automatically been offered the new modem, she was told that this is usually not done unless the customer complains.

In the United Kingdom, some participants were left with the feeling that in case of a genuine problem, it would not necessarily have been resolved. This was reflected in one of the comments of the participants:

*"It was, sort of, 'Switch off everything. Restart it all. We've checked your Internet online, and it's okay,' and that was pretty much the advice." (one participant in the United Kingdom)*

In contrast, other participants in this country reported instances of very good customer service. For example, in some cases technical issues were resolved immediately over the phone and in one case the participant was kept informed by text message of checks being made. A participant in the United Kingdom also reported having always been satisfied with the customer service of the provider:

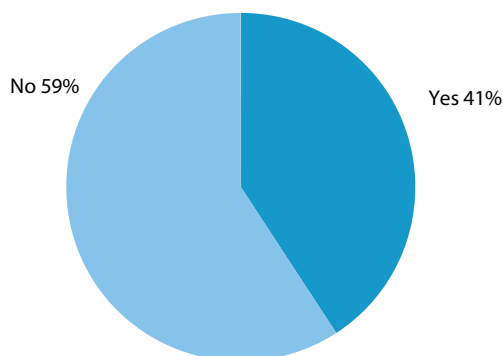
*'Well I am with [SUPPLIER], and every time I rang for technical problems they were brilliant. They actually rang me back and they rang me back twice, and [I thought] 'oh, that's impressive.' (one participant in the United Kingdom)*

### Negotiation of cheaper tariff by ISP

Participants in the five countries were offered a cheaper tariff by their ISP to prevent them from switching in about 4 out of 10 cases (see figure below).

**Figure 79.**  
Percentage of cases  
in which  
participants were  
offered a cheaper  
tariff by their ISP

Source: Switching exercise.  
(N=76; N indicates the total  
number of requests made for a  
cheaper tariff, by phone and  
email)

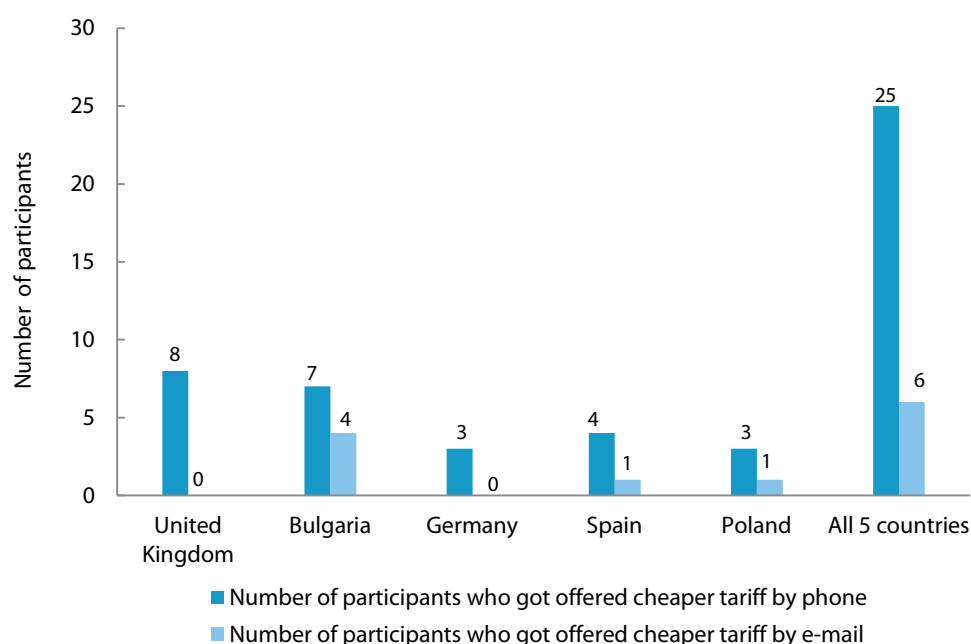


Participants were more often offered a cheaper tariff when they contacted their ISP by phone than by email. As indicated in the figure below, 25 participants were offered a cheaper tariff when they contacted their provider by phone but only 6 obtained a lower price when they sent their request by email. None of the participants in Germany and the United Kingdom and only one participant in Poland and another one in Spain were offered a cheaper tariff when they contacted their ISP by email. This is reflected in the following comment made by a participant in Spain:

*"The best offers are made by phone, when you ask them to send you it in writing they refuse." (one participant in Spain)*

**Figure 80.** Number of participants who were offered a cheaper tariff, analysis by mean of communication

Source: Switching exercise.



Some participants in Bulgaria received lower priced offers with the same technical conditions, but were asked to sign one to two year contracts, other were offered cheaper tariffs, but these were associated with lower speed.

In Spain, an ISP refused in two cases to provide the information required by participants to switch. In this country, the four participants who were offered a cheaper tariff obtained discounts of 10%, 20%, 32%, and 35% on their current tariffs, respectively.

In the United Kingdom, some providers offered a cheaper offer, but only on one occasion did this match the deal that the participant had found elsewhere, leading to one consumer choosing not to switch provider.

In Sweden, the three participants who negotiated a cheaper tariff managed to obtain a better deal. As a result, two of these participants decided to stay with their current providers.

**Specific aspects email**

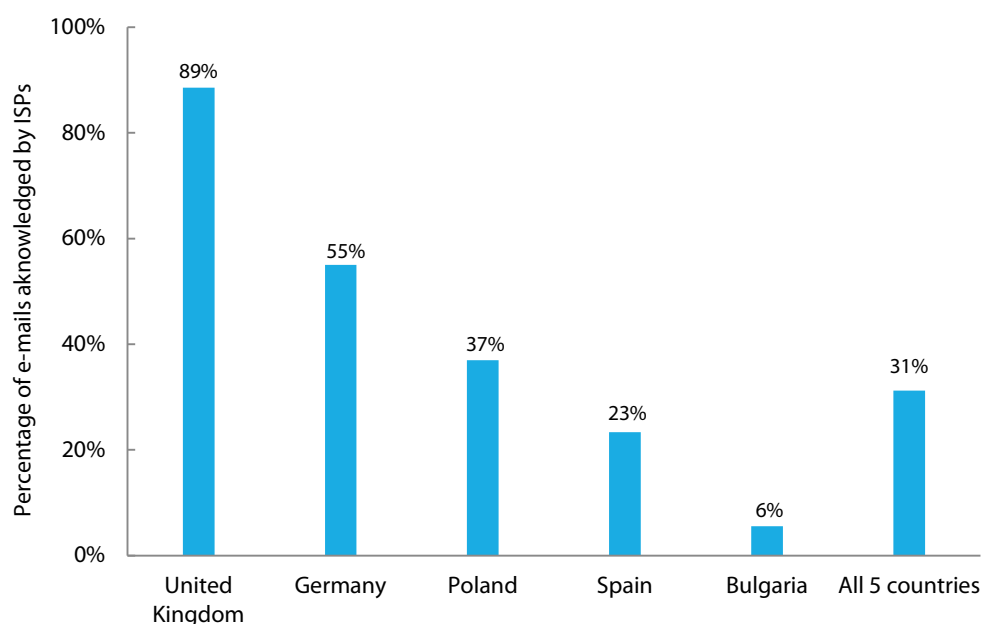
Participants contacted their providers through predefined emails to their old and new providers. This allowed them to test whether the ISPs would acknowledge their emails and reply to the issues that they raised. Data was also collected on the time taken by ISPs to answer these queries.

### Acknowledgement emails

Participants received an acknowledgement email (such as an automated note informing the participant that the query is being processed) for only about a third of the emails that they sent to their providers, as indicated in the figure below.

**Figure 81. Receipt of acknowledgement emails**

Source: Switching exercise. (N=334; N indicates the number of emails for which participants in the 5 countries provided data on the issue)



This rate varies significantly across countries. While participants in the United Kingdom received an acknowledgement email in almost 9 times out of 10, participants in Bulgaria received such emails in only less than 1 time out of 10. The generally positive experiences of British participants were echoed in the focus group discussions:

*"I sent an email one evening, got an automatic reply and then a proper email the next morning, which was good." (one participant in the United Kingdom)*

In Spain, the email address provided did not work in some cases. In Poland, most participants who contacted a major ISP for technical issues were advised to use the dedicated hotline at an extra fee.

In each country, some participants could not contact their ISP by email because no email address was available and, instead, completed an online contact form on the website of their providers. This was the case for participants subscribed to two ISPs in Spain, one ISP in Germany and another one in Poland. In Poland, however, this online form was often unavailable, as indicated by the results of the fieldwork.

One major provider in the United Kingdom did not provide an email address for customers to use, but provided instead a range of online tools that could be used by

customers to check specific aspects of the problem before contacting the ISP by telephone. Several participants actually liked the immediacy of problems being solved in this way, rather than waiting for an email response. These tools were felt by participants to be helpful and relevant, as illustrated by the following comment of a participant:

*"I spoke to them on the phone, but they usually send you back to their website... It was a bit frustrating at first, but now I know I can check online I think it's a pretty good way of doing it... It's the same tools they use to check things." (one participant in the United Kingdom)*

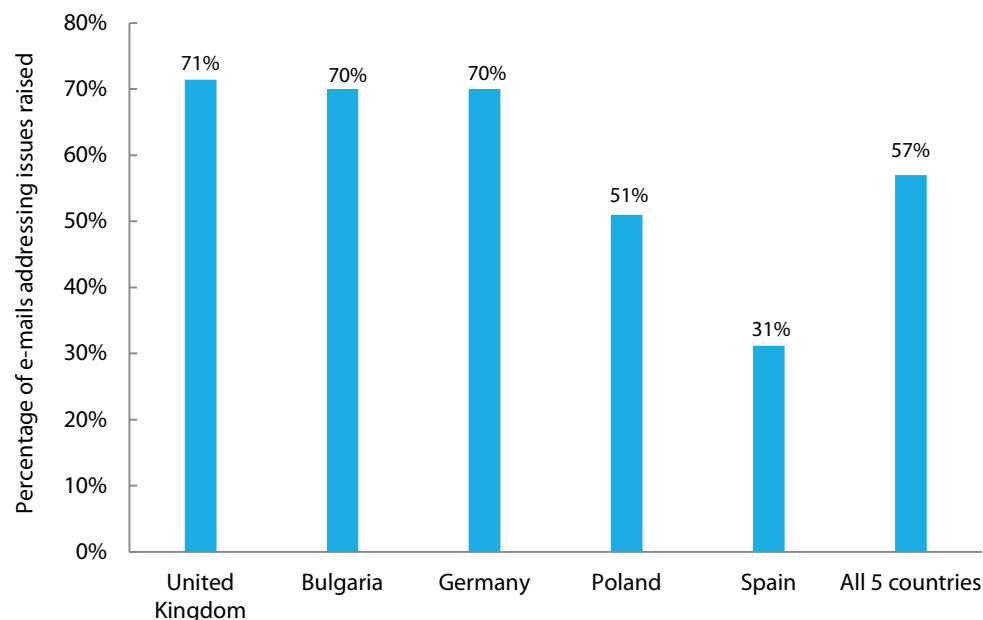
However, another participant in this country found some of the information technically challenging and indicated that she would have preferred to be given instructions over the phone while trying to fix the problems.

#### *Addressing issues raised*

Participants in the 5 countries received a response to their email that addressed the issue they raised in slightly more than half of the cases (see figure below). The lowest rate is found in Spain where the participants received an answer that directly responded to their query in only about 3 cases out of 10. By contrast, in the United Kingdom, Bulgaria, and Germany, participants received such an answer in about 7 cases out of 10.

**Figure 82.**  
*Reception of a response that addressed the issue raised*

Source: Switching exercise.  
(N=333; N indicates the number of emails for which participants in the 5 countries provided data on the issue)



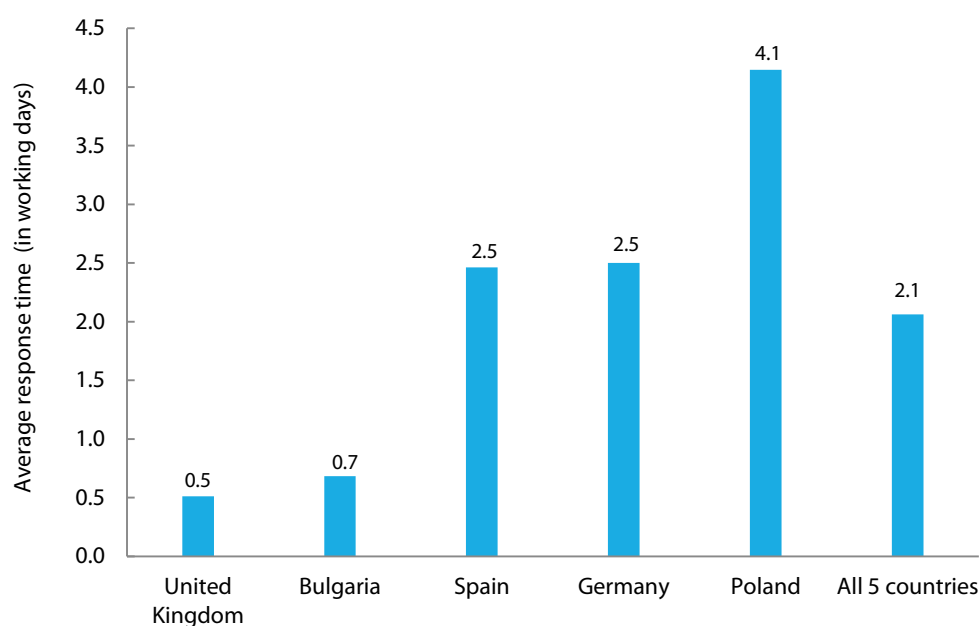
In Poland, participants in some cases received replies to their emails by post. In a few cases, in Poland and Bulgaria, the providers chose to call back the participants instead of writing an email. In Spain and Poland, participants were in some cases invited to call their ISP to discuss the issue, sometimes via a hotline at an extra fee. Nine participants in the United Kingdom stated that they were happy to receive links to specific FAQs on websites, as they often want to be enabled to fix problems themselves and avoid contacting customer services.

#### *Response time to query*

On average, participants in the 5 countries received a response to their email in two working days not considering acknowledgement messages. As indicated in the figure below, participants in the United Kingdom received a response the quickest (half a working day), while participants in Poland were those who waited the longest (over 4 working days) until they received a reply to their email from their providers. Participants in other countries had to wait on average between 0.7 and 2.5 working days until they got a response from their ISP.

**Figure 83.** Number of working days between sending of email and receiving response

Source: Switching exercise. (N=200; N indicates the number of emails for which participants in the 5 countries provided data on the issue)



### **Specific aspects phone calls**

Participants also contacted their providers by phone through predefined requests to their old and new providers. This allowed testing the accessibility of the customer service by phone and collecting information on the costs of phone calls to ISPs.

#### *Accessibility*

Participants got through immediately in 86% of their phone calls to their ISPs (see table below). In Germany, Spain, and the United Kingdom, participants immediately got through in more than 90% of their calls. In contrast, participants in Bulgaria and Poland managed to get through immediately less often (in 85% and 71% of calls, respectively). In these countries, participants needed to call several times until they could get through in 13% and 29% of cases, respectively.

**Table 3.** Number of times participants had to call before the line was free

Source: Switching exercise. (N=344; N indicates the number of phone calls for which participants in the 5 countries provided data on the issue)

Country	Immediately got through	Needed to call several times	Could not get through in spite of trying for 30 minutes
<b>Bulgaria</b>	85%	13%	3%
<b>Germany</b>	94%	6%	0%
<b>Poland</b>	71%	29%	0%
<b>Spain</b>	92%	5%	3%
<b>United Kingdom</b>	93%	7%	0%
<b>All 5 countries</b>	86%	12%	1%

As indicated in the table below, in approximately half of their phone calls, participants were put on hold (on average for about four minutes) before they could talk to a representative of the customer service. Participants in the United Kingdom are those who were put on hold the most often (64% of phone calls) and who waited the longest when put on hold (on average for about eight minutes). These figures were reflected in the comments made by British participants during the focus group discussion, who complained about long waiting times, particularly out of typical working hours, including weekends. Participants in Germany, who were put on hold for an average time of seven and a half minutes, explained that they felt discouraged to talk about their problems once they had reached a representative. In comparison, participants in Spain were put on hold for less than a third of their phone calls, with an average waiting time of less than a minute.

Some participants, such as in the United Kingdom, complained about complex and lengthy Interactive Voice Response (IVR) systems, as reflected in the comment of one participant:

*"You are listening [...] to fifteen options before you're actually speaking to someone and chances are it doesn't matter [what] you'd have pressed "* (one participant in the United Kingdom)



**Table 4. Waiting time until participants could speak to an agent**

Source: Switching exercise. (N=333; N indicates the number of phone calls for which participants in the 5 countries provided data on the issue)  
Note: \*Excludes the case of a participant who experienced a waiting time of almost one hour on a Sunday morning.

Country	Got straight through	Put on hold	If 'put on hold', average waiting time (in minutes)
Bulgaria	49%	51%	1.0
Germany	63%	38%	7.5
Poland	41%	59%	3.9
Spain	69%	31%	0.8
United Kingdom	36%	64%	7.9*
All 5 countries	51%	49%	4.2

In more than three-fourths of cases participants only spoke to one person during their phone call. This figure is the highest in Spain, where participants only spoke to one person in 95% of cases, and the lowest in Germany, where participants did so in only 42% of the cases. The few cases in which Spanish participants were put through to somebody else were essentially related to calls made to require information for switching provider. German participants waited on average about three and a half minutes when they were put through to somebody else (in 58 % of the cases).

**Table 5. Was the call transferred to somebody else?**

Source: Switching exercise. (N=289; N indicates the number of phone calls for which participants in the 5 countries provided data on the issue)

Country	Only spoke to one person	Put through to somebody else	If 'put through to somebody else', average waiting time (in minutes)
Bulgaria	75%	25%	0.5
Germany	42%	58%	3.7
Poland	78%	22%	2.4
Spain	95%	5%	0.5
United Kingdom	88%	12%	2.9
All 5 countries	76%	24%	2.0

### Call costs

When contacting their ISPs, participants used a free hotline for more than half of their phone calls, a normal domestic landline for almost a third of their calls, and a hotline at extra fee for less than one out of five calls (see table below). Participants in Spain and the United Kingdom are those who could use a free hotline the most often (for 76% and 80% of phone calls, respectively). In Bulgaria, the participants could use a free hotline for half of all calls (50%), while for another 48% of calls participants paid the price of a normal domestic call; for 3% of calls they had to pay an extra fee.

In contrast, participants in Poland and Germany incurred a cost in most cases when calling their ISPs. Polish participants had to use a hotline with an extra fee for almost one out of four phone calls and were charged the price of a normal domestic call for half of the calls. Most participants subscribed to a major ISP in Poland were specifically told to contact the provider with all technical issues using a dedicated hotline with an extra fee. One of the participants subscribed to this ISP tried to find information about the cost of this hotline at the time of signing the contract and when speaking to three different customer service representatives, but her efforts were in vain. German participants are those who had to call a hotline with extra fee the most often. They did so for more than half of their phone calls.

**Table 6. How was the call charged?**

Source: Switching exercise. (N=343, N indicates the number of phone calls for which participants in the 5 countries provided data on the issue)  
Note: In case participants had several options, they were recommended to choose the cheapest option.

Country	Free hotline	Normal domestic landline	Hotline with extra fee
All 5 countries	55%	29%	16%
Bulgaria	50%	48%	3%
Germany	39%	10%	52%
Poland	25%	54%	22%
Spain	76%	4%	21%
United Kingdom	80%	8%	12%

### 3.3.3 Researching offers for Internet services

#### Comparison of offers

##### *Ease of comparing offers*

In several countries, such as in Bulgaria and the United Kingdom, participants found it generally easy to compare the offers of ISPs. In Bulgaria, participants found that the presentation of these offers was generally clear. In the United Kingdom, participants pointed to an abundance of information on the Internet and most felt that terminology and descriptions of offers are largely similar across providers. One British participant, however, expressed some reservations in this respect. This participant found it difficult to compare tariffs offered by ISPs, as shown in the following comment:

*"When I was contacting different companies, they were saying, 'We've got six months at this deal'. I said, 'I just want to know what the price is going to be ultimately and I was comparing what the price would be, once the deal ran out!'"*  
(one participant in the United Kingdom)

In some cases, the comparison of offers was facilitated by the limited number of offers available in the area of the participant. For example, four out of ten participants in Poland had only two providers in their area. In other cases, the selection of a specific bundle by the participant also reduced the number of offers available. For example, one German participant could only choose between three offers because he was looking for a bundle including Internet, fixed telephony, and TV.

In Spain, participants generally felt that it was easier to compare offers including only one service than bundles of several services, as suggested by the comment of one participant in this country:

*"For me it was an easy task, because I only searched for information about one service that has a specific price." (one participant in Spain)*

As detailed above in Section 3.2, many of the consumers contacted in Sweden found the comparison of offers overwhelmingly difficult. They reported that all providers have different packages that are very difficult to compare in full.<sup>30</sup>

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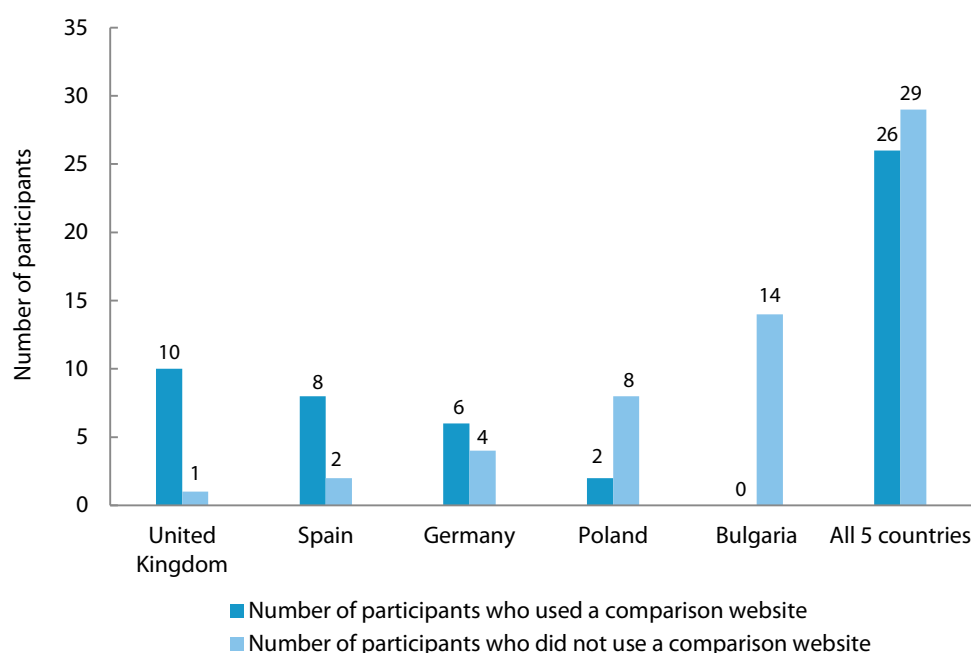
<sup>30</sup> This finding may be supported by a pair of results from the EU-wide consumer survey conducted for this study (see Part 2 of this report for the full consumer survey results and Part 1 for the synthesis report). Specifically, of those survey respondents who identified themselves as 'non-considerers' (that is, they indicated having no interest in switching their Internet service provider), 58% in Sweden reported satisfaction with their current provider as a reason for their non-interest in switching. This figure is 10% above the EU27 average. Also, the percentage of all survey respondents in Sweden that reported having compared different offers for Internet provision over the past 12 months and finding the comparison to be easy is 16% below the EU27 average.

### Use of comparison websites

Less than half of participants used a comparison website when researching offers for Internet services. The number of participants that utilised this tool varies significantly across the five countries, as indicated in the figure below.

**Figure 84.** Use of comparison websites by participants

Source: Switching exercise. (N=55; N indicates the number of participants in the 5 countries)



None of the participants in Bulgaria used a website to compare offers of ISPs, as they could not find such a website for their country. Participants in this country could nonetheless obtain information on the coverage of providers in their area by visiting dedicated websites.<sup>31</sup> Most participants in Poland (8 of 10 participants) did not use a comparison website because they did not know of any.

In the other countries (Germany, Spain and the United Kingdom), most participants used comparison websites. However, during the focus group discussion in Germany, participants mentioned that it was quite easy to compare offers even if they did not use comparison websites. In Spain, two participants indicated that they also visited websites of consumer organisations. In the United Kingdom, only one of the participants had never used a comparison website. All other participants in this country used such websites, including uswitch.com, moneysupermarket.com, moneysavingexpert.com, and broadband-finder.co.uk.

### Assessment of comparison websites

More than half of the participants who visited comparison websites when researching offers for Internet services found them useful for finding out information about

<sup>31</sup> These websites include <http://internet.inbulgaria.info>, <http://bglan.start.bg>, and <http://lan.start.bg>.

specific offers (14 of 26 participants, see figure below). Twelve of these participants found these websites easy to use and useful for finding customer comments, reviews, and ratings, and eleven indicated that they were useful for finding the best offer available in their area. Of the 26 participants who used comparison websites, 11 reported that they found their current ISP through a comparison website.

In Spain, less than half of the participants who used comparison websites found them easy to use and useful for finding out information about specific offers (3 of 8 participants, respectively). This is reflected in the comments made by participants in this country:

*"Price comparison websites are pretty confusing." (one participant in Spain)*

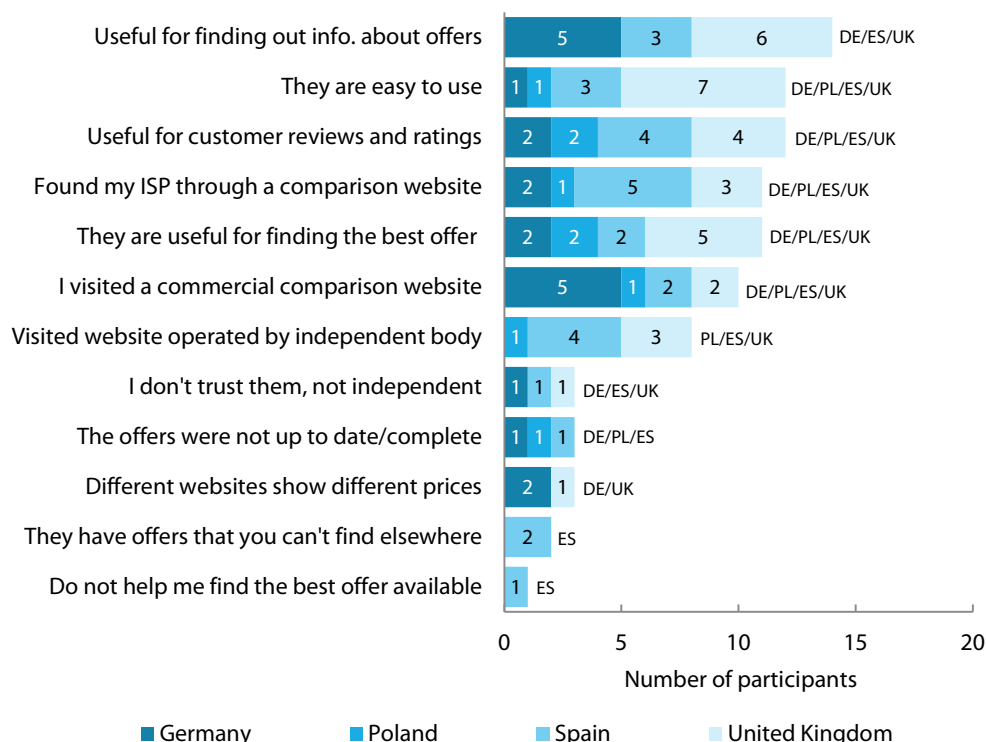
*"The prices published are not real. You have to go through various steps [to find out the real price]." (another participant in Spain)*

In contrast, most participants in Germany and the United Kingdom found comparison websites useful for finding out information about specific offers (5 of 6, and 6 of 10 participants, respectively). According to participants in the United Kingdom, these websites allowed them to compare conditions across a number of providers 'at a glance' and in one place. This reportedly saved time and eliminated the need for participants to do calculations themselves. They considered these sites as providing a picture of relative top-line offers rather than a definitive method of researching ISPs' offers. In the United Kingdom, many participants reported being familiar with comparison websites, as illustrated by the following comment of one participant:

*"I use comparison sites for everything, it makes it so easy" (one participant in the United Kingdom)*

**Figure 85.**  
*Assessment of comparison websites, number of participants who agreed with statement (multiple answers possible)*

Source: Switching exercise. (N=26; N indicates the number of participants in the five countries who agreed with the statement)  
Note: None of the participants in Bulgaria used a comparison website.



However, participants in the United Kingdom reported that prices shown on comparison websites are rarely the 'full' prices actually charged. Often compulsory extra charges had to be added to get the deal. These participants compared this to discount airlines, where the advertised airfare is the basic price before adding in luggage, booking and tax charges. Similarly, in the ISP market, basic prices may exclude line rental, or a specified price for a single service may only be achievable if taking out other services at the same time. Frustration with this situation is reflected in the following comments of participants:

*"The price advertised is never the actual price you pay after you have added everything in." (one participant in the United Kingdom)*

*"It didn't mention the £6 delivery charge for the modem." (another participant in the United Kingdom)*

### Clarity and understandability of offers

Participants were asked to rate the clarity of the information provided by ISPs on different aspects on a scale from 0 (not at all clear) to 10 (very clear). According to participants, the speed of the Internet connection and the duration of the contract constitute the two aspects on which information is the clearest (see tables on the next page). Information on the amount of data allowed to be downloaded, use of personal data or bank details, and monthly price was also generally perceived as clear (average rating between 6.0 and 6.8).

In contrast, participants gave an average rating of 5.0 to the clarity of the information provided by ISPs on other services included in the package (TV, fixed telephony, mobile telephony, etc.).

They rated the clarity of the information on additional online features (such as emails, online storage, and personal website) and additional costs (such as activation fees, extra charges, rebates, termination fees) below average (4.3 and 4.9, respectively). The clarity of the information on customer service (including technical support) and on blocking or slowing down of certain Internet services (including video streaming and Internet telephony) are the least highly rated aspects, with average ratings of 2.1 and 2.7, respectively.

**Table 7. Assessment of clarity of information provided by ISPs, average ratings (0 to 10) by participants**

	Bulgaria	Germany	Poland	Spain	United Kingdom	All countries
<b>Speed</b>	7.6	8.1	7.9	7.6	7.9	7.8
<b>Duration of contract</b>	8.8	6.9	8.3	6.5	8.8	7.8
<b>Data allowed to be downloaded<sup>(a)</sup></b>	6.6	7.0	6.9	5.5	8.0	6.8
<b>Use of personal data by ISP<sup>(b)</sup></b>	7.6	6.3	6.5	5.1	7.9	6.7
<b>Monthly price<sup>(c)</sup></b>	5.4	4.9	8.2	5.3	5.8	6.0
<b>Other services in package<sup>(d)</sup></b>	4.4	5.2	5.9	4.3	5.3	5.0
<b>Additional costs<sup>(e)</sup></b>	6.6	4.2	4.3	4.2	5.4	4.9
<b>Additional online features provided<sup>(f)</sup></b>	5.0	5.0	3.9	3.5	4.3	4.3
<b>Blocking/slowing down<sup>(g)</sup></b>	0.7	4.2	2.2	4.7	1.3	2.7
<b>Customer service<sup>(h)</sup></b>	1.8	3.6	1.6	0.8	2.8	2.1

Source: Switching exercise. (N= 48; N indicates the number of participants in the 5 countries who provided an assessment)  
Notes: Scale from 0 (not at all clear) to 10 (very clear), (a) without extra payment/slower speeds, (b) or bank details, (c) such as monthly subscription, line rental (d) TV, fixed telephony, mobile telephony, etc., (e) such as activation fees, extra charges, rebates, termination fees, (f) email/online storage/personal website, etc., (g) of certain Internet services (e.g. video streaming, Internet telephony etc.), (h) including technical support.

### *Speed of the Internet connection*

Although participants generally rated the clarity of the information on the speed of the Internet connection in the offers of ISPs highly (average rating of 7.8 on a scale from 0 to 10), some participants pointed out some shortcomings in this respect. For example, some participants in the United Kingdom expressed their frustration

concerning the difference between the advertised speed and the speed that they may actually receive, as illustrated in the following comment:

*"It always says, 'Up to' and it depends on where you are as to what speed you're going to get. So it's, you know, it could be up to [X Mbps] but in your area it could only actually be five". (one participant in the United Kingdom)*

Similar concerns were expressed by participants in Spain. They indicated that sometimes the advertised speed cannot be obtained in certain locations and this is not mentioned in the offer.

Participants in the United Kingdom and Spain also referred to discrepancies between the speed that was advertised by their ISP and the speed that they actually get.<sup>32</sup> In particular, one participant in the United Kingdom had paid for a fast connection (up to 20 Mbps) but only actually received a self-reported speed of 1.3 Mbps.

Participants in Bulgaria, Germany, and Poland reported that most offers they reviewed did not mention the upload speed. For example, one participant in Bulgaria was particularly interested in information on upload speed as he wished to upload a lot of data, but he did not find clear information about upload speed in the offers reviewed.

In Bulgaria, participants indicated during the focus group discussion that they considered their browsing experience to be quite satisfactory. However, one of these participants, who tested his connection, expressed disappointment with the upload speed.

#### *Download limit*

With an average rating of 6.8, participants usually perceived information on download limit as clear. In the United Kingdom, focus group discussions highlighted that some individuals struggled to understand the difference between download speeds and download limits. While it was clear for many, there was clearly some confusion over these two concepts for a minority, as shown by this exchange between participants in this country:

*"I've heard different stories from various people. Some people are saying, 'Well yes, you can have 100 meg', but that's your usage for the month, not the speed you're getting it through your line."*

*"I thought 100 meg was speed?"*

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<sup>32</sup> As stated in Part I of this report, broadband is a complex service, subject to a variety of technical factors, which cause actual speeds for individual users to vary, sometimes significantly. While, it may not be possible to advertise one exact figure that all customers can expect to receive, this does not make it impossible to provide consumers with a reasonable indication of what speeds they are likely to attain, e.g. by stating both maximum and minimum speeds in offers.



*"It's more that, 'meg' is speed and gigabytes is usage."*

*"Yes, I mean, I haven't got a usage parameter on mine."*

*"You might have one. It might say unlimited."*

*"It goes back to my point about the fact that unless they talk through it with you, you wouldn't know."*

When the download limits are not well understood or able to be monitored, the customer may end up paying more for download capacities that they may not need, as illustrated by the comment of a participant in the United Kingdom:

*"I would always go for unlimited, because I don't know what we use and I wouldn't even know where to start to understand what we use, so we'd always do unlimited." (One participant in the United Kingdom)*

To a degree, 'fair download limits' are accepted by participants in the United Kingdom and those with concerns will check the specifics with their ISPs. For those who do not download much or ever exceed any limits, this is not a high area of concern and they do not tend to check the details.

#### *Line rental/monthly subscription price*

With an average rating of 6.0, information on the monthly subscription price (such as monthly subscription and line rental) was generally considered to be clear. On average, participants in Germany rated the clarity of this type of information less highly (average of 4.9) than participants in other countries.

Despite the overall good rating given by participants for this type of information, subscription prices are sometimes seen as misleading, as the headline advertised price may not be the actual monthly price the customer ends up paying after adding in line rental or upfront charges. For example, one participant in the United Kingdom reported that one provider advertised monthly broadband prices at 3.25 British Pounds. While this was the actual price for the broadband service itself, service users had to have line rental with the deal at a further cost of 12 British Pounds. The actual 3.25 British Pounds price was therefore not achievable as an isolated cost.

Similarly, participants in Bulgaria reported that offers do not always clearly state that the subscription price may be raised after a promotional period. Participants in this country indicated that some offers did not mention that specific conditions are applicable only for contracts of a minimum duration. For example, when participants asked to have a contract with no minimum duration, they were offered less attractive tariffs, such as a lower speed at a higher price. Scepticism was also expressed by participants in Bulgaria concerning low prices, which were seen as a possible sign for a low quality of service. For example, an offer of 3 Euro per month was quoted, but none of the participants chose such an offer as it seemed "too good to be true".

### *Surcharges/activation costs/termination costs*

The clarity of the information provided in the offers of ISPs on additional costs (such as activation fees, extra charges, rebates, termination fees) was rated below average by participants (4.9 average rating).

According to participants in Spain, information on additional costs is usually only given verbally or in the contract. Also, these participants reported that some of the offers reviewed did not list a price including the Value Added Tax (VAT). VAT was not included in 7 of the 10 offers from 9 providers which were collected by participants in Spain. The participants in this country reported that the VAT was not included in the price of 1 of 4 offers that they collected from comparison websites.

In the United Kingdom, one participant was subject to unexpected cancellation charges, as her ISP had put her onto a rolling contract but she reported that this was not made clear to her:

*"I never thought I had signed up to that and I don't remember ever being told that was the case." (One participant in the United Kingdom)*

According to one participant in Poland, one ISP advertised an offer with 'no fixed term contract'. This ISP also charges an activation fee which is only paid in case of early termination of the contract. In other words, the ISP has a typical early termination fee which is only named differently.

One participant in Bulgaria identified an issue concerning the clarity of the information provided concerning surcharges. According to this participant, the ISP did not make it clear in the offer that an extra payment may be required for each computer added to the subscription.

### *Provision of customer service*

The clarity of the information on the provision of customer service (including technical support) was the aspect least highly rated by participants (average rating of 2.1).

The review of offers by participants in the United Kingdom suggests that the provision of customer service is not consistently or clearly communicated across ISPs. Those which have UK based call centres make this much clearer in their communications, whereas those with overseas call centres tend to 'hide' this in the small print.

In Bulgaria, most of the participants did not express much trust in the information provided on customer service. According to these participants, many offers did not mention many customer issues in their offers. They indicated that usually only a 24/7 support line is advertised, but participants were rather sceptical about the possibility to obtain support during the night, although this was not tested.

### *Criteria identified for clear and transparent offers*

Participants discussed their criteria for clear and transparent offers during the focus group. They concluded that information on the following items should be clearly listed in the offers of ISPs:

- ▶ Price, including information on the monthly subscription price, prices of additional options, price of equipment required, price after the end of eventual promotional periods, and duration of contract in relation to the advertised price;
- ▶ Early termination fees;
- ▶ Speed, including information on both download and upload speeds and on speeds which can actually be received by customers;
- ▶ Coverage of offer (especially in the case of mobile Internet);
- ▶ Description of each element constituting bundles (for example, concerning the number of TV channels);
- ▶ Accessibility of customer service (including means of communications used).

Participants considered that clearly stated bullet-points of the specifics of the offer (as listed above) may make the information easier to absorb, make more immediate sense of, and facilitate comparisons.

In Poland, one of the participant pointed out that often offers appear to be clear, but when ISPs are contacted they may not offer the same conditions as those advertised, as illustrated by the following comment:

*"There is a huge difference in what is in the leaflets and the reality." (one participant in Poland)*

In the United Kingdom, a few participants accessed tools that allowed them to better understand which broadband speed they needed. The feedback provided on these tools by one participant in this country suggests that they are useful:

*"If somebody says, 'I'll give you a twenty megabit carrier rate, or whatever,' then I get confused with what I can do with it. If somebody says, 'Well, you can download five films a week, and it will take you, for a two hour film, it'll take you roughly ten minutes,' then that's what I want. I want it in English." (one participant in the United Kingdom)*

Similarly, a participant in Spain considered that a tool that would allow simulating needs in terms of download allowance would be useful, as shown in her comment:

*"The online offers should include a simulator showing cost when downloading. This way the consumer will know (in terms of their needs) the [download limit] that they need to contract so as to avoid surprises later." (one participant in Spain)*

### 3.3.4 The switching experience

#### *Ease of switching process and problems experienced*

##### *Ease of switching process*

Participants generally found it easy to switch their ISP. Forty-five participants were of the opinion that switching providers is very or fairly easy, while ten participants found this process to be fairly or very difficult (see table below).

All participants in Bulgaria and the United Kingdom reported that it was very or fairly easy to switch after they had decided on a provider. Similarly, most participants in Spain (8 of 10 participants), Germany and Poland (6 of 10 participants in each country) found it very easy or fairly easy to switch, as indicated in the table below.

**Table 8.** How easy was it to actually switch?

Source: Switching exercise. (N=55; N indicates the number of switchers in the 5 countries)

Country	Very easy	Fairly easy	Fairly difficult	Very difficult
<b>Bulgaria</b>	13	1	0	0
<b>Germany</b>	3	3	3	1
<b>Poland</b>	1	5	2	2
<b>Spain</b>	2	6	0	2
<b>United Kingdom</b>	7	4	0	0
<b>All 5 countries (number of participants)</b>	26	19	5	5
<b>All 5 countries (% of participants)</b>	47%	35%	9%	9%

The German participant in the switching exercise who found switching provider very difficult explained that she terminated the contract with her old provider at the end of March 2012 but was not supplied with an Internet connection by her new provider until the beginning of May 2012 (this participant arranged the switch herself).

One of the two Polish participants who found it very difficult to switch explained that she had to contact her old provider to obtain information which the new provider then used to arrange the switch. She further noted that cancellation of the contract with her old provider was initially delayed and that the information necessary for the switch was not readily provided. The other Polish participant who found it very difficult to switch (and who arranged the switch herself) was without Internet access due to the switching process for 31 days.

Two participants in Spain found it very difficult to switch provider, as illustrated in the following comments:

*“For me, switching companies has been very difficult. They haven’t made it easy nor were they very clear when I needed information” (one Spanish participant).*

*“I still don’t know what Internet offer they have activated in the new company. In other words they still haven’t sent me my contract with them, despite speaking with them 23 times, asking for the contract” (same Spanish participant).*

*“Once I terminated the contract with the previous company, I started a new contract with the new company who informed me that the former were refusing to permit me to switch. In the end they made me repeat the whole process of terminating” (Another Spanish participant).*

### Problems encountered during the switching process

Approximately half of the participants who implemented the exercise in the five countries did not experience any problems when switching their ISP (see table below). However, their experiences vary significantly across countries and reflect the extent to which participants found it easy to switch.

**Table 9. Did you experience any problems switching?**

Source: Switching exercise. (N=55; N indicates the number of switchers in the 5 countries). Note: \* Some UK participants still had not had their services migrated to new providers by the time of the focus group discussion. Thus, two of these participants were unable to provide an answer.

Country	No	Yes	No answer
<b>Bulgaria</b>	14	0	0
<b>Germany</b>	4	6	0
<b>Poland</b>	1	9	0
<b>Spain</b>	3	7	0
<b>United Kingdom</b>	5	4	2
<b>All 5 countries (number of participants)</b>	27	26	2
<b>All 5 countries (% of participants)</b>	49%	47%	4%

None of the participants in Bulgaria reported that they experienced problems when switching their ISP. All participants in this country had contracts with no minimum duration (including, for example, prepaid arrangements) and could therefore switch rapidly.

In the United Kingdom, the majority of participants who provided information on the issue answered that they also did not experience any problems during this process (5 of 9 participants). Focus group discussions in this country suggested that when problems were experienced these were quickly forgotten once the service was installed and working properly. As already mentioned above, the Bulgarian and British participants are also those who found it the easiest to switch (almost all Bulgarian participants and 7 of 11 British participants found it very easy to switch).

In contrast, almost all participants in Poland experienced problems (9 of 10 participants) and a majority of participants in Germany and Spain reported negative experiences when switching their providers (6 of 10 and 7 of 10 participants, respectively). These participants are also those who made more contrasting

assessments concerning the ease of the switching process. In Germany, Poland and Spain, even if almost half of the participants found it fairly easy to switch (14 of 30 participants in total), only a fifth found it very easy (6 participants) and a third found it fairly or very difficult (10 participants). The following comments made by participants in Spain illustrate some of the problems experienced:

*"Once I terminated the contract with the previous company, I started a new contract with the new company who informed me that the former were refusing to permit me to switch." (one participant in Spain)*

*"I still haven't been charged but I have been informed that I will be penalized for terminating my contract. And I understood that in the contract I was not going to be penalized." (another participant in Spain)*

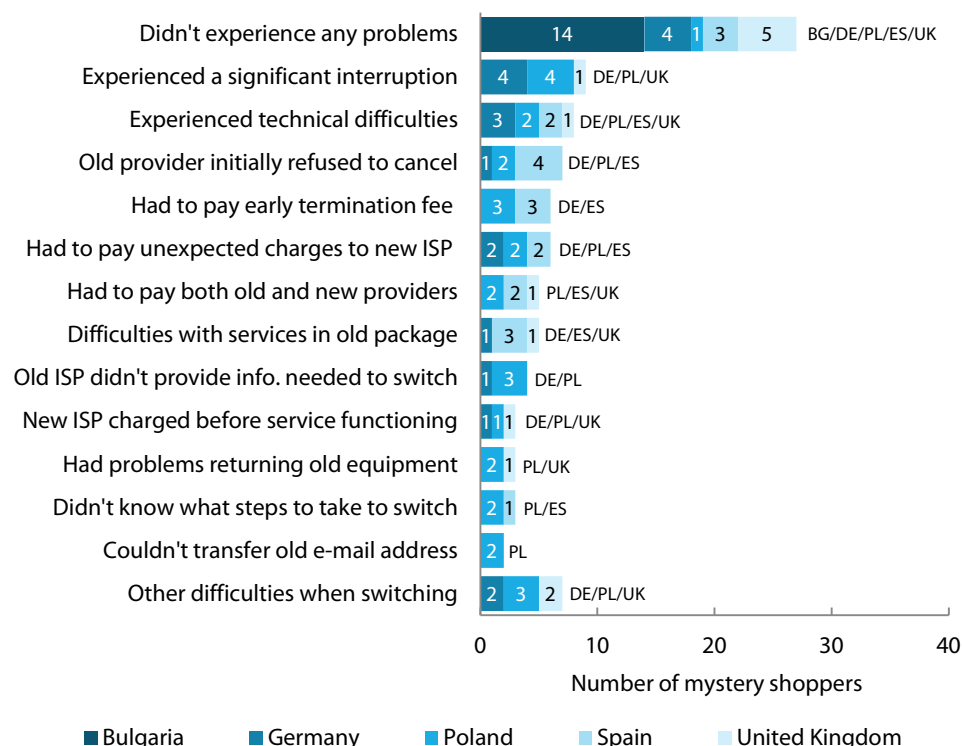
As shown in the figure below, the most frequent problem reported by participants in the five countries relates to a significant interruption of their Internet service when switching (9 participants). Just under a third of the participants who experienced problems had technical difficulties (8 participants). More than a fourth of the participants who experienced problems indicated that their old provider initially refused to cancel their contract or delayed the cancellation of their contract (7 participants).<sup>33</sup> Other problems frequently reported by participants include the payment of an early termination fee to their old provider (6 participants) and the payment of charges or costs to the new provider that the participant was not aware of before signing the contract (6 participants).

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<sup>33</sup> The three problem types most often reported by the switching exercise participants ('significant service interruption when switching', 'technical difficulties', and 'old provider initially refusing or delaying contract cancellation') were all among the four problems most frequently mentioned by consumer survey respondents who had switched provider (see Section 7 of Part 1 of this report for a detailed presentation of these consumer survey results).

**Figure 86. Problems experienced by participants when switching (multiple answers possible)**

Source: Switching exercise. (N=55; N indicates the number of switchers in the 5 countries)



### Continuity of service during switching process

More than half of the participants (33 participants) did not experience any interruption of their Internet connection during the switching process. Fourteen of these participants are from Bulgaria, where none of the switchers experienced a loss of service. In this country, participants personally handled the switching process and, because they all had contracts with no minimum duration, they were easily able to plan the termination and starting dates of their Internet connection with their providers.

In Spain and the United Kingdom, most participants did not experience any interruption of service, and when they did experience it, the interruption was usually short (from a couple of hours to up to 3 days). One participant in the United Kingdom, however, was without connection for a week because his router had to be replaced.

By contrast, in Germany and Poland, two participants experienced an interruption of between 4 and 6 days, four between 10 and 28 days, and two of a month or more. For example, a German participant terminated her contract with her old provider at the end of March 2012 but was not supplied with an Internet connection from her new provider before the beginning of May 2012.

**Table 10. Continuity of service during switching process**

Source: Switching exercise. (N=55; N indicates the number of switchers in the 5 countries). Note: \* Some UK participants still had not had their services migrated to new providers by the time of the focus group discussion. Thus, two of these participants were unable to provide an answer.

Country	No interruption of connection	Interruption of connection	No answer
Bulgaria	14	0	0
Germany	4	5	1
Poland	3	7	0
Spain	6	4	0
United Kingdom	5	4	2*
<b>All 5 countries (number of participants)</b>	<b>33</b>	<b>19</b>	<b>3</b>
<b>All 5 countries (% of participants)</b>	<b>60%</b>	<b>35%</b>	<b>5%</b>

### The new provider

#### Reasons for choosing the new provider

The three main reasons most often cited by the 55 participants for choosing their current provider are as follows (see figure below):

- ▶ Best value for money (35 participants)
- ▶ Speed of Internet connection (29 participants)
- ▶ Special promotion or offer (18 participants)

The data collected suggests that the price of the service is a very important factor for participants in the United Kingdom and, to a lesser extent, in Spain when choosing their provider. In the United Kingdom, almost all participants (10 of 11 participants) indicated that best value for money was the main reason for choosing their new provider and 8 participants mentioned the possibility of taking advantage of a special promotion or offer (7 and 5 of 10 participants in Spain, respectively). During the focus group discussion in the United Kingdom, some participants indicated that UK-based customer service is also a strong consideration in choosing a provider. For example, one participant in this country reported the following issue with a customer service based abroad:

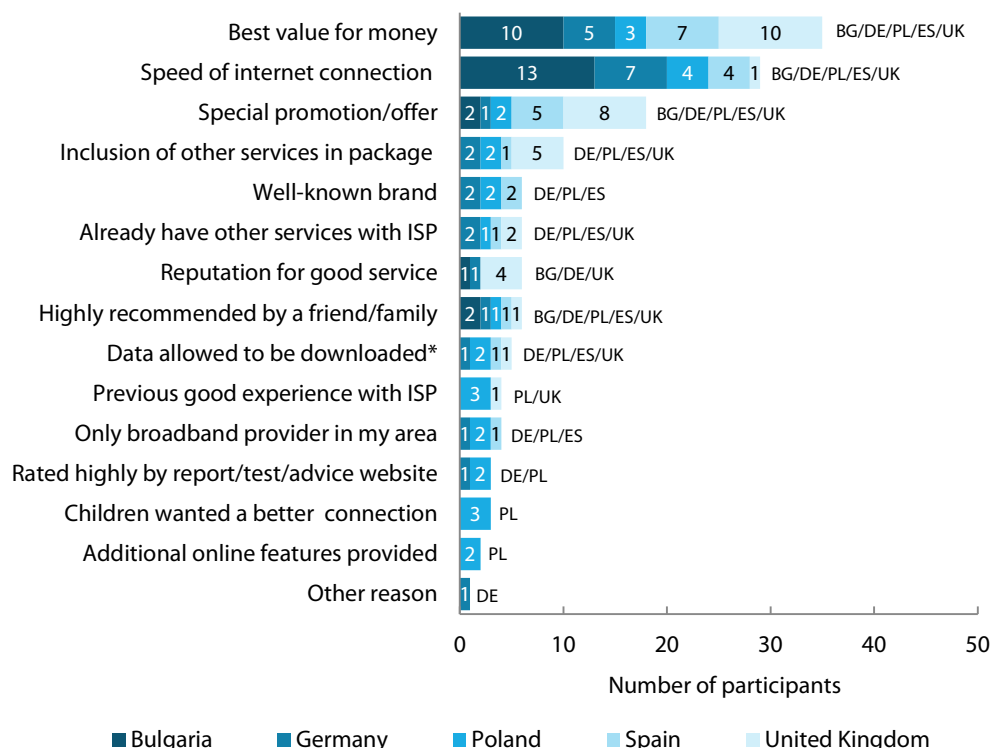
*"I found that when I was phoning the customer services for [SUPPLIER], because their customer service is in India, understanding what they're saying to you and them understanding what you're saying to them is very, very difficult. You find yourself repeating yourself over and over and over again." (one participant in the United Kingdom)*

The speed of the Internet connection is the reason most often indicated for choosing the new provider by participants in Bulgaria (13 of 14 participants) and in Germany (7 of 10 participants).



**Figure 87. Main reasons for choosing new ISP according to participants (multiple answers possible)**

Source: Switching exercise.  
Note: \*Without extra payment/slower speeds.  
(N=55; N indicates the number of switchers in the 5 countries)



### Satisfaction with new provider

More than two thirds of participants (38 participants) reported being satisfied that they had switched their provider. The other participants were not satisfied because the new provider was not as good or as cheap as they had thought (8 and 4 participants, respectively).

Participants who reported that their new provider is not as good as they had thought experienced the following problems:

- ▶ A loss of their Internet connection for a significant amount of time (2 participants in Poland and 1 participant in the United Kingdom)
- ▶ Technical difficulties with the new service (1 participant in Germany, 1 participant in Poland, 1 participant in Spain, and 1 participant in the United Kingdom)
- ▶ The new provider charged for the new Internet connection before it became functional (1 Polish participant and 1 German participant)
- ▶ The participant could not take the email address that he used with his old provider with him (1 Polish participant)
- ▶ The old provider initially refused to cancel the contract/delayed cancellation of the contract (1 German participant)

**Table 11.**  
*Satisfaction with  
new provider*

Source: Switching exercise.  
(N= 55; N indicates the number of  
switchers in the 5 countries).

Note: \* The duration of the  
switching process in the UK varied  
significantly for participants. Some  
participants still had not had their  
services migrated to their new  
providers by the time of the focus  
group discussion. As a result, four  
participants were unable to assess  
their new providers before the the  
close of the exercise.

Country	Satisfied	Not satisfied because new ISP not as good as thought	Not satisfied because new ISP not as cheap as thought	Not satisfied because even better deals are available	Not satisfied because of other reasons	No answer
<b>Bulgaria</b>	13	1	0	0	0	0
<b>Germany</b>	8	1	0	0	1	0
<b>Poland</b>	5	3	2	0	0	0
<b>Spain</b>	7	1	2	0	0	0
<b>UK</b>	5	2	0	0	0	4*
<b>All 5 countries (participants)</b>	38	8	4	0	1	4
<b>All 5 countries (% participants)</b>	69%	15%	7%	0%	2%	7%

Almost all participants (13 participants) in Bulgaria were satisfied. More than two thirds of participants in Germany (8 participants) and Spain (7 participants) also indicated their satisfaction with having switched their provider. The two participants who were not satisfied in Germany referred to long waiting time, technical difficulties with the new service, charges that had to be paid for the new Internet connection before it became functional, and to charges or costs that they were not aware of before signing the contract with the new provider. In Spain, two of the unsatisfied participants indicated that their new providers are not as cheap as they had thought. The other Spanish participant who was not satisfied with the new provider found that the quality of the customer service is worse than with the previous ISP.

In Poland and the United Kingdom only about half of the participants reported that they were satisfied with their new ISP. In Poland, participants who reported that their new provider was not as good as thought experienced a loss of their Internet connection for a significant amount of time (2 participants) and technical difficulties with the new service (1 participant). In one case, the new provider charged for the new Internet connection before it became functional, and in another case the participant could not take the email address that he used with his old provider with him. In the United Kingdom, one of the participants was not satisfied because the connection broke down 30 minutes after it was installed. Upon contacting the provider, the participant was told that there would be a substantial charge to send an engineer out. Later the participant was told that there would be an even more substantial charge, though the issue was eventually resolved upon threatening to cancel the contract:

*“When I actually got my router come through, I put it all together and... they said,  
‘Right, you’ll be live as soon as we put this plug on the wall... they’ll switch your line*

*on later. Just keep picking up the phone and checking if you've got a dial tone.' That didn't happen that day. The next day I had a phone call saying, 'Oh, you're live now, that's it, you can go and plug everything in.' So I plugged everything in, switched it on, had my Internet on for half an hour, and it went off completely. I unplugged everything, plugged everything back in, turned everything off, plugged it back in again, and the Internet light wasn't coming on on the router. I had to phone him up and the first person I spoke to, she didn't really listen to anything I said at all. She was saying, 'What's the problem?' I said, 'Look, I think I've got a faulty router,' explaining everything. She's going, 'Okay, we can send out an engineer, it'll be £49.95.' I said, 'You've got no chance of me paying £49.95, I only went live half an hour ago and it's gone off all together.' 'No, that's the only thing we can do.' They're running through all these, 'Turn it off, switch it on,' everything else. She said, 'I tell you what, ring back in an hour's time. Turn everything off, unplug it all, put it all back in, ring back in an hour's time.' I rang back and I got through to somebody else and this time the charge for the engineer was £129.95... I went ballistic on the phone. I [said], 'What are you talking about? I'm a new customer and my light's just gone off. You can't tell me that I've got to pay £129.95 now for someone to come out and fix something that obviously isn't right in the first place.' I said, 'It's my router, can't you just send me a new router?' 'No, we can't send you a new router.' I said, 'Right, fine. Cancel the lot.' I said, 'You can switch everything off.' They put me through to cancellations and as soon as I got through to cancellations, the man on the other end of the phone said, 'We'll send you out a router.' So I spent three quarters of an hour getting myself worked up, shouting at everybody and they sent me a new router out, but I had to wait six or seven days for that to come out." (one participant in the United Kingdom)*

In some cases, participants indicated that they may switch again, as indicated by one participant in Spain:

*"I am happy with the switch. The service is faster and more economical. But I don't think I will stay with this company very long, because the old provider has been in touch with me to improve the offer I have at the moment." (One participant in Spain)*

In Bulgaria, participants indicated their intention to monitor the market and possibly switch again if better offers appear; but expressed concerns with the minimum period of the contracts that they signed with the new providers in this respect.

Problems experienced by participants during the switching process, even if quickly forgotten once the service is working properly (see above), may have an adverse effect on the future decision to switch, as illustrated by the comment of one participant in this country:

*"I can't be bothered with the hassle of changing and I wouldn't want to change again for a few more years if I can help it" (one participant in the United Kingdom)*

### 3.3.5 Clarity and transparency of ISP bills

During the group discussions, participants discussed the clarity and transparency of the bills that they received from their ISPs.

In Bulgaria, only 5 of 14 participants received monthly bills, which were all considered to be very simple and easy to understand. The other participants did not receive bills because they have prepaid arrangements.

Similarly, participants in Germany, Spain, and the United Kingdom were generally of the opinion that bills are clear and understandable; and participants in Poland considered the bills to be much clearer than the offers. This overall positive assessment is illustrated in the comment of a participant in the United Kingdom:

*"I think the billing is very clear, it's just when you're buying a package that you start to juggle a bit. I would say the billing information is very good." (one participant in the United Kingdom)*

Participants in the United Kingdom reported that they rarely look at their actual bills, either in paper or online format and largely check this by looking at their bank statement. These participants explained that they have an anticipated figure in mind and if the amount deducted fits in line with expectations, the bill is not consulted, as suggested by the following comments:

*"I know what I signed up for with [provider] and that's what comes out every month. [...] It's the same every month and I know what I pay for." (one participant in the United Kingdom)*

*"It's all on the Internet on the email and they give you a list of the calls. It was all straightforward [with the old provider] and then it says, 'Discount because you're a [provider] customer, £5. Total will be collected on this date'. It was all very straightforward." (another participant in the United Kingdom)*

Several participants in Spain however reported their concerns concerning the first bill from the new provider, as illustrated in the following comments:

*"You have to pay close attention to the first bill because if not you can be charged for services that you are unaware you have requested." (one participant in Spain)*

*"The first bill with the new company arrived with a charge [...] that was titled 'lengthening of cabling'. I had known nothing about this so I disputed this and they have confirmed that they will reimburse me." (another participant in Spain)*

Participants also discussed their criteria for clear and transparent bills. They particularly discussed aspects in relation to price, billing periods, and contact details of the customer service, as explained below.

- ▶ *Price.* Participants generally considered it important that the provider provides an itemised bill. In Bulgaria, some ISPs offer one month free, if three monthly payments are made in advance. Others offer two months free, if ten months are paid in advance. Participants in this country indicated that they would appreciate it if this type of information was presented in the bills.
- ▶ *Billing Period.* Participants in Germany, Poland, and Spain indicated that the billing period should be clearly stated. Participants in Bulgaria considered that stating a period as "5 January – 4 February" is better than only "January".
- ▶ *Contact details of customer service.* Participants in Germany, Poland, and Spain were of the opinion that bills should clearly display contact details of the provider, in particular a phone number.
- ▶ *Other aspects.* Participants in Poland considered that information should not be provided in small print and that bills should only present relevant information and no advertisement. According to participants in Bulgaria, bills should also contain clear information about the possible means of payment accepted by the ISP.

### 3.3.6 Unfair commercial practices and unfair contract terms

Participants were asked whether they had experienced or noted commercial practices and contractual provisions that they consider to be unfair. In addition, consumer organisations that coordinated the switching exercise in their country also provided information on market practices that they considered to be unfair. The extent to which concerns arose varied between countries.

In the United Kingdom, Bulgaria, and Poland, a frequently reported practice considered unfair by switching participants concerned advertisements relating to connection speed. For example, this could involve a failure to mention that consumers would need to buy special equipment or be located in a certain area to achieve the advertised speed. Other practices highlighted include displaying the download or maximum speed alone, without including the upload and/or minimum speed.

Regarding contract terms, a salient issue reported by switching exercise participants in the United Kingdom was rollover contracts, i.e. contracts that are automatically renewed. Another concern in Poland related to the language used in contracts, which was found to be particularly complex by participants.

In general, participants in Germany and Spain reported relatively fewer occurrences of practices or contract terms that they considered unfair than in the other countries where the switching exercise took place.

These and other potentially unfair provisions were documented by the participants and consumer organisations then further analysed by our team of legal experts. The results of this analysis are presented in Section 8 of the synthesis report (Part 1).

## **ANNEX 1: QUESTIONNAIRE FOR COMPARISON WEBSITES**

*This annex presents the questionnaire used to evaluate comparison websites. This is an abbreviated version of the questionnaire comprising the questions for one product (Product 1). In total, mystery shoppers searched for 5 products.*

## Questionnaire for Comparison Websites for Internet Provision

<b>I. Identification</b>	
1. Mystery shopper name	<i>Name</i>
2. Country for which you are conducting the mystery shopping	<input type="checkbox"/> Austria <input type="checkbox"/> Belgium <input type="checkbox"/> Bulgaria <input type="checkbox"/> Cyprus <input type="checkbox"/> Czech Republic <input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Finland <input type="checkbox"/> France <input type="checkbox"/> Germany <input type="checkbox"/> Greece <input type="checkbox"/> Hungary <input type="checkbox"/> Iceland <input type="checkbox"/> Ireland <input type="checkbox"/> Italy <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Luxembourg <input type="checkbox"/> Malta <input type="checkbox"/> Netherlands <input type="checkbox"/> Norway <input type="checkbox"/> Poland <input type="checkbox"/> Portugal <input type="checkbox"/> Romania <input type="checkbox"/> Slovakia <input type="checkbox"/> Slovenia <input type="checkbox"/> Spain <input type="checkbox"/> Sweden <input type="checkbox"/> United Kingdom
3. Today's date	<i>Please specify</i>
4. Start time	<i>Please specify</i>
5. Locations used for your country (copy from separate sheet)	<i>Location 1 (capital city) Please specify</i> <i>Location 2 (large city) Please specify</i> <i>Location 3 (small/medium city) Please specify</i> <i>Location 4 (small/medium city) Please specify</i> <i>Location 5 (village) Please specify</i> <i>Location 6 (village) Please specify</i>



**II. Comparison Website (CW) being tested**

6. Name of Comparison Website	<i>Please specify</i>
7. URL of Comparison Website	<i>Please specify</i>

**III. Contact Information for CW**

*Is the following information about the CW available on the website? (Please check front page, "contact us", "about us", imprint, FAQ pages)*

8. Business address	Select one option
9. Email address to contact CW	Select one option <i>If "yes", Copy and paste email address: Please specify</i>
10. Telephone number to contact CW	Select one option
11. VAT Identification Number, or (if not available) company registration number.  <i>(VAT identification number: The first two letters indicate the Member State (e.g. DE, or UK), followed by between 5 and 12 characters. These 5 to 12 characters are numeric in most countries but in some countries they may contain letters.)</i>	Select one option

**IV. Information on CW business practices**

***Is the following information about the business practices of the CW available to the consumer? Please check the front page, "about us", imprint, and FAQ pages.***

12. Does the CW clearly explain to the consumer why certain ISPs and their offers are listed and not others?	Select one option Comments
<i>If "yes":</i> 13. Copy and paste relevant text from the website.	<i>Please specify</i>
14. Is there a clear explanation of the default ranking of search results (the view that appears first)?	Select one option Comments
15. Is the CW run by a private company, a regulator or an NGO? Select one option	Select one option Comments
16. Specify the sources of the CW's revenue as indicated on the website. Mark all that apply.	<input type="checkbox"/> ISPs pay to be listed <input type="checkbox"/> ISPs pay to have their logo displayed <input type="checkbox"/> ISPs pay to receive a more prominent listing in the results <input type="checkbox"/> Pay-per-click (ISP pays each time a consumer clicks on the link to its website) <input type="checkbox"/> Pay-per-link (ISP pays each time it is linked on the PCW) <input type="checkbox"/> Pay-per-sale (ISP pays each time a sale results from

	<p>a consumer following an offer on the PCW)</p> <p><input type="checkbox"/> Advertising on CW</p> <p><input type="checkbox"/> Sponsored by providers</p> <p><input type="checkbox"/> Funded by government or non-profit organisation</p> <p><input type="checkbox"/> Other <i>Please specify</i></p> <p><input type="checkbox"/> Information unclear</p> <p><input type="checkbox"/> No information provided</p> <p>Comments</p>
17. How frequently are offers listed on the CW updated, according to the information provided?	<p>Select the option that fits best</p> <p>Comments</p>

<b>V. Membership of accreditation scheme/code of conduct</b>	
<i>Is the following information available to the consumer? Please check the front page and the "about us" page.</i>	
18. Does the CW belong to an accreditation scheme? <i>See: <a href="http://en.wikipedia.org/wiki/Accreditation">http://en.wikipedia.org/wiki/Accreditation</a></i>	Select one option
<i>If "yes"</i> 19. Please give the name of scheme.	<i>Please specify</i>
20. Please copy link to website of scheme, if available.	<i>Please specify</i>
21. Does the CW belong to an industry code of conduct? <i>See: <a href="http://en.wikipedia.org/wiki/Code_of_conduct">http://en.wikipedia.org/wiki/Code_of_conduct</a></i>	Select one option
<i>If "yes"</i> 22. Please give the name of code.	<i>Please specify</i>
23. Please copy link to website of code, if available.	<i>Please specify</i>

<b>VI. Search function of the comparison website (CW)</b>	
<p>24. According to which criteria is it possible to search for offers? Please select all that apply.</p> <p><i>Note: The term 'search' means that the website allows you to narrow down the number of offers according to specific search criteria, e.g. location, speed, etc.</i></p>	<p><input type="checkbox"/> Location</p> <p><input type="checkbox"/> Speed</p> <p><input type="checkbox"/> Type of package/bundle (internet and phone, internet and TV etc.)</p> <p><input type="checkbox"/> Technology (DSL, fibre etc.)</p> <p><input type="checkbox"/> Contract duration</p> <p><input type="checkbox"/> Name of provider</p> <p><input type="checkbox"/> Price range</p> <p><input type="checkbox"/> Special offers/rebates/bonuses only</p> <p><input type="checkbox"/> Popularity</p>

		<input type="checkbox"/> Other search criteria <i>Please specify</i> <input type="checkbox"/> No search function available Comments
<i>If search by location:</i>	25. What possibilities are there to check availability by location? Please select all that apply.	<input type="checkbox"/> Post code <input type="checkbox"/> Phone number <input type="checkbox"/> Phone area code <input type="checkbox"/> Address <input type="checkbox"/> City <input type="checkbox"/> Region <input type="checkbox"/> Other <i>Please specify</i> Comments
<i>If search by location <u>and</u> search by one or more other criteria are indicated in question 24 above:</i>	26. Is it possible to search via location and other criteria simultaneously, or only separately?	Please select from the dropdown menu Comments
27. Does the CW provide general information on broadband services and assessments of ISPs' service quality that help consumers choosing a provider?		<input type="checkbox"/> Provides customer reviews of providers <input type="checkbox"/> Provides broadband speed testing service <input type="checkbox"/> Monitors broadband speeds of various ISPs and compares results of speed tests <input type="checkbox"/> Provides guidance how to switch providers <input type="checkbox"/> Provides news on broadband speed <input type="checkbox"/> Other information provided <i>Please specify</i> <input type="checkbox"/> No such information provided Comments

## VII. Price and choice of offers identified by comparison websites – Product 1: Broadband Internet only

ISP product specifications for **Product 1: Broadband Internet only** (including line rental) with an advertised download speed of: 2 Mbps to 12 Mbps (2,000 Kbps to 12,000 Kbps).

28. **Location 1** (as indicated on first page of questionnaire)

- Search for location possible (-> complete section for locations 1 to 6)  
 No location search possible (-> use this section to document search results for product 1, and skip locations 2 to 6 for this product)

Comments

*Please search for this product using the product specifications and location 1. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).*

29. Please indicate download speed used for query:

- Search by download speed possible *Please specify*

<input type="checkbox"/> No search by download speed possible Comments	
30. Identify the default view of the offers listed, i.e. the view of search results that appears automatically without choosing any preference.	<input type="checkbox"/> Ranked by price (lowest price first) <input type="checkbox"/> Ranked by price (highest price first) <input type="checkbox"/> Ranked by speed <input type="checkbox"/> Ranked by type of package/bundle (internet and phone, internet and TV etc.) <input type="checkbox"/> Ranked by contract duration <input type="checkbox"/> Ranked by name of provider <input type="checkbox"/> Ranked by availability of special offers/rebates/bonuses <input type="checkbox"/> Ranked by relevance <input type="checkbox"/> Ranked by popularity <input type="checkbox"/> Sponsored links ranked first <input type="checkbox"/> Other ranking <i>Please specify</i> <input type="checkbox"/> No order identifiable Comments
31. Does the CW offer the option to compare prices that include all monthly costs (including line rental) and all one-off costs and rebates, averaged over a certain period (e.g. six months, one, or two years)?	Select one option Comments
<p><i>Choose the “lowest price” view (or similar), where available, so that offers are ranked according to price <u>starting with the lowest price offer</u>. If available on this CW, choose the option to take all costs into account (e.g. including activation fee, line rental, etc.). If no “lowest price” view is available, use default view.</i></p> <p><i>In the following questions we refer to the <u>cheapest correct offer</u>. This is the cheapest offer that matches the product specifications (correct bundle and within speed range). Offers outside the defined speed range are not considered. In case several correct offers inside the defined speed range are listed that differ in some other aspects (such as monthly download limit/usage allowance or contract duration), choose the lowest priced of these offers.</i></p> <p><i>In case several prices are listed for each of the offers, the relevant price information to be documented in this questionnaire is the <u>yearly or ‘first year’ price</u> that takes as many costs into account (e.g. activation fee, line rental, etc.) as possible (if this price is available).</i></p> <p><i>Otherwise, choose the <u>average monthly price</u> that takes as many costs into account as possible.</i></p> <p><i>If no yearly or average monthly price is listed, choose the <u>standard monthly price</u> (i.e. the monthly price once any introductory price valid for a limited period has expired).</i></p>	
32. How many clicks does it take to get from the default view to the lowest price view?	Please select from the dropdown menu
33. Is it easy to find and adjust the CW to lowest price view?	<i>Please select one option</i> Comments
34. Can you identify the cheapest	Please select from the dropdown menu

correct offer?	<p>If No, specify the reasons:</p> <p><input type="checkbox"/> No correct offer listed</p> <p><input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different</p> <p><input type="checkbox"/> Other reason <i>Please specify</i></p> <p>If No, <i>skip the next questions and go to the next Location.</i></p>
<b>Continue only if answer to previous question is Yes:</b>	
35. Please specify the total number of <u>providers</u> listed with a correct offer (i.e. correct bundle type and within speed range).	Select one option
36. What is the price of the <u>offer of the incumbent ISP</u> , if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?	<p>Name of provider: <i>Please specify</i></p> <p>Name of tariff: <i>Please specify</i></p> <p>Price: <i>Please specify</i></p> <p>Currency: <i>Please specify</i></p> <p><input type="checkbox"/> No offer of the incumbent among the correct offers</p> <p>Comments</p>
37. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?	<p>Select one option</p> <p><input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results</p>
38. Indicate the <u>name</u> of the cheapest correct offer listed.	<p>Name of provider: Please specify</p> <p>Name of tariff: Please specify</p> <p>Copy the description of offer, including the download speed, from the CW</p> <p>Please specify</p> <p><input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 36)</p>
39. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed.  Note: Mobile Internet is excluded.	<p>Please select from the dropdown menu</p> <p>If other, please specify</p>
40. Is the cheapest correct offer <u>available</u> for this location, according to the CW?  Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and there is now no indication to the contrary.	<p>Please select from the dropdown menu</p> <p>Comments</p> <p><i>If Not available, skip the next questions and go to the next Location.</i></p>
41. What is the <u>price of the cheapest correct offer</u> listed?	<p>Price: Please specify</p> <p>Currency: Please specify</p> <p>Comments</p>

<p>42. Please specify the type of price. Mark only one option in each category.</p>	<p><b>Price period</b> Select one option Comments</p> <p><b>Price type</b> Select one option Comments</p>
<p>43. Does this price include one or more of the following components? Mark all that apply.</p>	<p><input type="checkbox"/> Activation costs/installation costs  <input type="checkbox"/> Equipment costs  <input type="checkbox"/> Rebates/bonuses  <input type="checkbox"/> Line rental  <input type="checkbox"/> Other costs Please specify  <input type="checkbox"/> Unclear Please specify  Comments</p>
<p><b>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</b></p>	
<p>44. Does the link take you directly to the page with the correct offer on the ISP website?</p>	<p>Please select from the dropdown menu  Comments  <i>If No, skip the next questions and go to the next Location.</i></p>
<p><i>If Yes:</i> 45. Please copy URL of offer</p>	<p>Please specify</p>
<p>46. Is the offer <u>available</u> for this location, according to the ISP?  Note: Check availability for this Location again, this time on the ISP website.</p>	<p>Please select from the dropdown menu  Comments  <i>If Not available, skip the next questions and go to the next Location</i></p>
<p>47. Is the <u>price</u> provided on the CW for this offer (see question 41) identical to the price on the ISP website?</p>	<p>Please select from the dropdown menu  If not identical, provide reason:  Please select from the dropdown menu  Comments</p>
<p>48. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u>?</p>	<p>Please select from the dropdown menu  If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer:  <input type="checkbox"/> Activation costs/installation costs  <input type="checkbox"/> Equipment costs  <input type="checkbox"/> Rebates/bonuses  <input type="checkbox"/> Line rental  <input type="checkbox"/> Other costs Please specify  Comments</p>
<p>49. Is the <u>speed</u> provided on the CW for</p>	<p>Please select from the dropdown menu</p>

this offer identical to the speed on the ISP website?	Comments
<b>Product 1 - Location 2</b>	
<p>50. Please go back to the CW and search now for the same product specifications for <b>location 2</b>.</p> <p><input type="checkbox"/> Search for location 2 possible</p> <p><input type="checkbox"/> No search possible for this location</p> <p>Comments</p> <p><i>Please search for this product using the product specifications and location 2. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).</i></p>	
<p>51. Please indicate download speed used for query:</p> <p><input type="checkbox"/> Search by download speed possible Please specify</p> <p><input type="checkbox"/> No search by download speed possible</p> <p>Comments</p>	
<p>52. Can you identify the cheapest correct offer?</p>	<p>Please select from the dropdown menu</p> <p>If No, specify the reasons:</p> <p><input type="checkbox"/> No correct offer listed</p> <p><input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different</p> <p><input type="checkbox"/> Other reason <i>Please specify</i></p> <p>If No, skip the next questions and go to the next Location.</p>
<b>Continue only if answer to previous question is Yes:</b>	
<p>53. Please specify the total <u>number of providers</u> listed with a correct offer (i.e. correct bundle type and within speed range).</p>	<p>Select one option</p>
<p>54. What is the price of the <u>offer of the incumbent ISP</u>, if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?</p>	<p>Name of provider: <i>Please specify</i></p> <p>Name of tariff: <i>Please specify</i></p> <p>Price: <i>Please specify</i></p> <p>Currency: <i>Please specify</i></p> <p><input type="checkbox"/> No offer of the incumbent among the correct offers</p> <p>Comments</p>
<p>55. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?</p>	<p>Select one option</p> <p><input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results</p>
<p>56. Indicate the <u>name</u> of the cheapest correct offer listed.</p>	<p>Name of provider: Please specify</p> <p>Name of tariff: Please specify</p> <p>Copy the description of offer, including the download speed, from the CW</p> <p>Please specify</p>

	<input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 54)
57. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed. Note: Mobile Internet is excluded.	Please select from the dropdown menu If other, please specify
58. Is the cheapest correct offer <u>available</u> for this location, according to the CW? Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and there is now no indication to the contrary.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location.</i>
59. What is the <u>price of the cheapest correct offer</u> listed?	Price: Please specify Currency: Please specify Comments
60. Please specify the type of price. Mark only one option in each category.	<b>Price period</b> Select one option Comments <b>Price type</b> Select one option Comments
61. Does this price include one or more of the following components? Mark all that apply.	<input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify <input type="checkbox"/> Unclear Please specify Comments
<b>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</b>	
62. Does the link take you directly to the page with the correct offer on the ISP website?	Please select from the dropdown menu Comments <i>If No, skip the next questions and go to the next Location.</i>
<i>If Yes:</i> 63. Please copy URL of offer	Please specify
64. Is the offer <u>available</u> for this location, according to the ISP? Note: Check availability for this Location again, this time on the ISP website.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location</i>



<p>65. Is the <u>price</u> provided on the CW for this offer (see question 59) identical to the price on the ISP website?</p>	<p>Please select from the dropdown menu If not identical, provide reason: Please select from the dropdown menu Comments</p>
<p>66. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u>?</p>	<p>Please select from the dropdown menu If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer: <input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify Comments</p>
<p>67. Is the <u>speed</u> provided on the CW for this offer identical to the speed on the ISP website?</p>	<p>Please select from the dropdown menu Comments</p>
<p><b>Product 1 - Location 3</b></p>	
<p>68. Please go back to the CW and search now for the same product specifications for <b>location 3</b>. <input type="checkbox"/> Search for location 3 possible <input type="checkbox"/> No search possible for this location Comments <i>Please search for this product using the product specifications and location 3. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).</i></p>	
<p>69. Please indicate download speed used for query: <input type="checkbox"/> Search by download speed possible Please specify <input type="checkbox"/> No search by download speed possible Comments</p>	
<p>70. Can you identify the cheapest correct offer?</p>	<p>Please select from the dropdown menu If No, specify the reasons: <input type="checkbox"/> No correct offer listed <input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different <input type="checkbox"/> Other reason <i>Please specify</i> If No, skip the next questions and go to the next Location.</p>
<p><b>Continue only if answer to previous question is Yes:</b></p>	
<p>71. Please specify the total <u>number of providers</u> listed with a correct offer (i.e. correct bundle type and within speed</p>	<p>Select one option</p>

range).	
72. What is the price of the <u>offer of the incumbent ISP</u> , if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?	Name of provider: <i>Please specify</i> Name of tariff: <i>Please specify</i> Price: <i>Please specify</i> Currency: <i>Please specify</i> <input type="checkbox"/> No offer of the incumbent among the correct offers Comments
73. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?	Select one option <input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results
74. Indicate the <u>name</u> of the cheapest correct offer listed.	Name of provider: Please specify Name of tariff: Please specify Copy the description of offer, including the download speed, from the CW Please specify <input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 72)
75. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed.  Note: Mobile Internet is excluded.	Please select from the dropdown menu If other, please specify
76. Is the cheapest correct offer <u>available</u> for this location, according to the CW?  Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and there is now no indication to the contrary.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location.</i>
77. What is the <u>price of the cheapest correct offer</u> listed?	Price: Please specify Currency: Please specify Comments
78. Please specify the type of price. Mark only one option in each category.	<b>Price period</b> Select one option Comments <b>Price type</b> Select one option Comments
79. Does this price include one or more of the following components? Mark all that apply.	<input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses

	<input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify <input type="checkbox"/> Unclear Please specify Comments
<p><b>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</b></p>	
80. Does the link take you directly to the page with the correct offer on the ISP website?	Please select from the dropdown menu Comments <i>If No, skip the next questions and go to the next Location.</i>
<i>If Yes:</i> 81. Please copy URL of offer	Please specify
82. Is the offer <u>available</u> for this location, according to the ISP?  Note: Check availability for this Location again, this time on the ISP website.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location</i>
83. Is the <u>price</u> provided on the CW for this offer (see question 77) identical to the price on the ISP website?	Please select from the dropdown menu If not identical, provide reason: Please select from the dropdown menu Comments
84. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u> ?	Please select from the dropdown menu If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer: <input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify Comments
85. Is the <u>speed</u> provided on the CW for this offer identical to the speed on the ISP website?	Please select from the dropdown menu Comments
<b>Product 1 - Location 4</b>	
86. Please go back to the CW and search now for the same product specifications for <b>location 4</b> . <input type="checkbox"/> Search for location 4 possible <input type="checkbox"/> No search possible for this location Comments <i>Please search for this product using the product specifications and location 4. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).</i>	

<p>87. Please indicate download speed used for query:</p> <p><input type="checkbox"/> Search by download speed possible Please specify</p> <p><input type="checkbox"/> No search by download speed possible</p> <p>Comments</p>	
<p>88. Can you identify the cheapest correct offer?</p>	<p>Please select from the dropdown menu</p> <p>If No, specify the reasons:</p> <p><input type="checkbox"/> No correct offer listed</p> <p><input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different</p> <p><input type="checkbox"/> Other reason <i>Please specify</i></p> <p>If No, <i>skip the next questions and go to the next Location.</i></p>
<p><b>Continue only if answer to previous question is Yes:</b></p>	
<p>89. Please specify the total <u>number of providers</u> listed with a correct offer (i.e. correct bundle type and within speed range).</p>	<p>Select one option</p>
<p>90. What is the price of the <u>offer of the incumbent ISP</u>, if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?</p>	<p>Name of provider: <i>Please specify</i></p> <p>Name of tariff: <i>Please specify</i></p> <p>Price: <i>Please specify</i></p> <p>Currency: <i>Please specify</i></p> <p><input type="checkbox"/> No offer of the incumbent among the correct offers</p> <p>Comments</p>
<p>91. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?</p>	<p>Select one option</p> <p><input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results</p>
<p>92. Indicate the <u>name</u> of the cheapest correct offer listed.</p>	<p>Name of provider: Please specify</p> <p>Name of tariff: Please specify</p> <p>Copy the description of offer, including the download speed, from the CW</p> <p>Please specify</p> <p><input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 90)</p>
<p>93. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed.</p> <p>Note: Mobile Internet is excluded.</p>	<p>Please select from the dropdown menu</p> <p>If other, please specify</p>
<p>94. Is the cheapest correct offer <u>available</u> for this location, according to the CW?</p> <p>Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and</p>	<p>Please select from the dropdown menu</p> <p>Comments</p> <p><i>If Not available, skip the next questions and go to the next Location.</i></p>

there is now no indication to the contrary.	
95. What is the <u>price of the cheapest correct offer</u> listed?	Price: Please specify Currency: Please specify Comments
96. Please specify the type of price. Mark only one option in each category.	<b>Price period</b> Select one option Comments <b>Price type</b> Select one option Comments
97. Does this price include one or more of the following components? Mark all that apply.	<input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify <input type="checkbox"/> Unclear Please specify Comments
<b>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</b>	
98. Does the link take you directly to the page with the correct offer on the ISP website?	Please select from the dropdown menu Comments <i>If No, skip the next questions and go to the next Location.</i>
<i>If Yes:</i> 99. Please copy URL of offer	Please specify
100. Is the offer <u>available</u> for this location, according to the ISP? Note: Check availability for this Location again, this time on the ISP website.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location</i>
101. Is the <u>price</u> provided on the CW for this offer (see question 95) identical to the price on the ISP website?	Please select from the dropdown menu If not identical, provide reason: Please select from the dropdown menu Comments
102. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u> ?	Please select from the dropdown menu If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer: <input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs

	<input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify Comments
103. Is the <u>speed</u> provided on the CW for this offer identical to the speed on the ISP website?	Please select from the dropdown menu Comments
<b>Product 1 - Location 5</b>	
104. <i>Please go back to the CW and search now for the same product specifications for <b>location 5</b>.</i>	
<input type="checkbox"/> Search for location 5 possible <input type="checkbox"/> No search possible for this location Comments <i>Please search for this product using the product specifications and location 5. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).</i>	
105. Please indicate download speed used for query:	
<input type="checkbox"/> Search by download speed possible Please specify <input type="checkbox"/> No search by download speed possible Comments	
106. Can you identify the cheapest correct offer?	Please select from the dropdown menu If No, specify the reasons: <input type="checkbox"/> No correct offer listed <input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different <input type="checkbox"/> Other reason <i>Please specify</i> If No, <i>skip the next questions and go to the next Location.</i>
<b>Continue only if answer to previous question is Yes:</b>	
107. Please specify the total <u>number of providers</u> listed with a correct offer (i.e. correct bundle type and within speed range).	Select one option
108. What is the price of the <u>offer of the incumbent ISP</u> , if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?	Name of provider: <i>Please specify</i> Name of tariff: <i>Please specify</i> Price: <i>Please specify</i> Currency: <i>Please specify</i> <input type="checkbox"/> No offer of the incumbent among the correct offers Comments
109. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?	Select one option <input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results

<p>110. Indicate the <u>name</u> of the cheapest correct offer listed.</p>	<p>Name of provider: Please specify  Name of tariff: Please specify  Copy the description of offer, including the download speed, from the CW  Please specify  <input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 108)</p>
<p>111. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed.  Note: Mobile Internet is excluded.</p>	<p>Please select from the dropdown menu  If other, please specify</p>
<p>112. Is the cheapest correct offer <u>available</u> for this location, according to the CW?  Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and there is now no indication to the contrary.</p>	<p>Please select from the dropdown menu  Comments  <i>If Not available, skip the next questions and go to the next Location.</i></p>
<p>113. What is the <u>price of the cheapest correct offer</u> listed?</p>	<p>Price: Please specify  Currency: Please specify  Comments</p>
<p>114. Please specify the type of price.  Mark only one option in each category.</p>	<p><b>Price period</b>  Select one option  Comments  <b>Price type</b>  Select one option  Comments</p>
<p>115. Does this price include one or more of the following components?  Mark all that apply.</p>	<p><input type="checkbox"/> Activation costs/installation costs  <input type="checkbox"/> Equipment costs  <input type="checkbox"/> Rebates/bonuses  <input type="checkbox"/> Line rental  <input type="checkbox"/> Other costs Please specify  <input type="checkbox"/> Unclear Please specify  Comments</p>
<p><b><i>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</i></b></p>	
<p>116. Does the link take you directly to the page with the correct offer on the ISP website?</p>	<p>Please select from the dropdown menu  Comments  <i>If No, skip the next questions and go to the next Location.</i></p>
<p><i>If</i> 117. Please copy URL of offer</p>	<p>Please specify</p>

Yes:	
118. Is the offer <u>available</u> for this location, according to the ISP? Note: Check availability for this Location again, this time on the ISP website.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location</i>
119. Is the <u>price</u> provided on the CW for this offer (see question 113) identical to the price on the ISP website?	Please select from the dropdown menu If not identical, provide reason: Please select from the dropdown menu Comments
120. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u> ?	Please select from the dropdown menu If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer: <input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify Comments
121. Is the <u>speed</u> provided on the CW for this offer identical to the speed on the ISP website?	Please select from the dropdown menu Comments
<b>Product 1 - Location 6</b>	
122. <i>Please go back to the CW and search now for the same product specifications for <b>location 6</b>.</i> <input type="checkbox"/> Search for location 6 possible <input type="checkbox"/> No search possible for this location Comments <i>Please search for this product using the product specifications and location 6. If it is not possible to search by all criteria (e.g. type of package and speed) then use the search criteria possible (e.g. just type of package).</i>	
123. Please indicate download speed used for query: <input type="checkbox"/> Search by download speed possible Please specify <input type="checkbox"/> No search by download speed possible Comments	
124. Can you identify the cheapest correct offer?	Please select from the dropdown menu If No, specify the reasons: <input type="checkbox"/> No correct offer listed <input type="checkbox"/> Correct offers listed, but I cannot compare them, because price information for offers is different <input type="checkbox"/> Other reason <i>Please specify</i> If No, <i>skip the next questions and go to the next</i>



	<i>Location.</i>
<b>Continue only if answer to previous question is Yes:</b>	
125. Please specify the total <u>number of providers</u> listed with a correct offer (i.e. correct bundle type and within speed range).	Select one option
126. What is the price of the <u>offer of the incumbent ISP</u> , if it is available and matches the product specifications of your query (i.e. if it is among the correct offers)?	Name of provider: <i>Please specify</i> Name of tariff: <i>Please specify</i> Price: <i>Please specify</i> Currency: <i>Please specify</i> <input type="checkbox"/> No offer of the incumbent among the correct offers Comments
127. What is the <u>rank</u> of the <u>cheapest</u> correct offer listed?	Select one option <input type="checkbox"/> Cheapest correct offer <u>not</u> listed on page 1 of search results
128. Indicate the <u>name</u> of the cheapest correct offer listed.	Name of provider: Please specify Name of tariff: Please specify Copy the description of offer, including the download speed, from the CW Please specify <input type="checkbox"/> Cheapest correct offer is the offer of the incumbent (as indicated in question 126)
129. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed. Note: Mobile Internet is excluded.	Please select from the dropdown menu If other, please specify
130. Is the cheapest correct offer <u>available</u> for this location, according to the CW? Note: Select option "available" if the CW initially allowed you to search for availability of offers at this location and there is now no indication to the contrary.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location.</i>
131. What is the <u>price of the cheapest correct offer</u> listed?	Price: Please specify Currency: Please specify Comments
132. Please specify the type of price. Mark only one option in each category.	<b>Price period</b> Select one option Comments <b>Price type</b> Select one option

	Comments
133. Does this price include one or more of the following components? Mark all that apply.	<input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify <input type="checkbox"/> Unclear Please specify Comments
<b>Please click on the link of the cheapest correct offer that leads you to the website of the ISP (using a right mouse click to choose option: open in new tab).</b>	
134. Does the link take you directly to the page with the correct offer on the ISP website?	Please select from the dropdown menu Comments <i>If No, skip the next questions and go to the next Location.</i>
<i>If Yes:</i> 135. Please copy URL of offer	Please specify
136. Is the offer <u>available</u> for this location, according to the ISP? Note: Check availability for this Location again, this time on the ISP website.	Please select from the dropdown menu Comments <i>If Not available, skip the next questions and go to the next Location</i>
137. Is the <u>price</u> provided on the CW for this offer (see question 131) identical to the price on the ISP website?	Please select from the dropdown menu If not identical, provide reason: Please select from the dropdown menu Comments
138. Are there <u>price components</u> listed on the ISP website which were not included in the price information on the CW and therefore <u>lead to a higher price of the actual offer</u> ?	Please select from the dropdown menu If yes, mark the price components that were <u>not</u> included in the price information on the CW and that lead to a higher price of the actual offer: <input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify Comments
139. Is the <u>speed</u> provided on the CW for this offer identical to the speed on the ISP website?	Please select from the dropdown menu Comments

## **XII. Summary assessment of comparison website**

*Please assess on basis of your experience in searching for offers with this CW*

140. How would you rate the user-friendliness of the CW?	<i>Please select one option</i> Comments
141. Did you find it easy to compare the prices of different offers listed on the CW?	<i>Please select one option</i> Comments
142. Did you find it easy to compare the technical aspects of different offers listed on the CW (speed, download limit, etc.)?	<i>Please select one option</i> Comments
143. How good would you estimate the coverage of offers from different internet providers on this CW to be?	<i>Please select one option</i> Comments
144. How accurate was the information provided on the CW, when compared with the information given on the ISP website?	<i>Please select one option</i> Comments
145. Indicate your level of agreement with the following statement: 'I found this CW to be useful in allowing me to make an informed choice'.	<i>Please select one option</i> Comments
146. Indicate your level of agreement with the following statement: 'This CW provided clear and understandable price information'.	<i>Please select one option</i> Comments
147. Please write any additional comments you have about the CW.	<i>Please specify</i>
148. End time	<i>Please specify</i>

## ANNEX 2: QUESTIONNAIRE FOR ISP WEBSITES

*This annex presents the questionnaire used to evaluate ISP websites. This is an abbreviated version of the questionnaire comprising the questions for one product (Product 1). In total, mystery shoppers searched for 5 products.*

## Questionnaire for Internet Service Providers

<b>I. Identification</b>	
1. Mystery shopper name	<i>Name</i>
2. Country for which you are conducting the mystery shopping	<input type="checkbox"/> Austria <input type="checkbox"/> Belgium <input type="checkbox"/> Bulgaria <input type="checkbox"/> Cyprus <input type="checkbox"/> Czech Republic <input type="checkbox"/> Denmark <input type="checkbox"/> Estonia <input type="checkbox"/> Finland <input type="checkbox"/> France <input type="checkbox"/> Germany <input type="checkbox"/> Greece <input type="checkbox"/> Hungary <input type="checkbox"/> Iceland <input type="checkbox"/> Ireland <input type="checkbox"/> Italy <input type="checkbox"/> Latvia <input type="checkbox"/> Lithuania <input type="checkbox"/> Luxembourg <input type="checkbox"/> Malta <input type="checkbox"/> Netherlands <input type="checkbox"/> Norway <input type="checkbox"/> Poland <input type="checkbox"/> Portugal <input type="checkbox"/> Romania <input type="checkbox"/> Slovakia <input type="checkbox"/> Slovenia <input type="checkbox"/> Spain <input type="checkbox"/> Sweden <input type="checkbox"/> United Kingdom
3. Today's date	<i>Please specify</i>
4. Start time	<i>Please specify</i>
5. Locations used for your country (copy from separate sheet)	<i>Location 1 (capital city) Please specify</i> <i>Location 2 (large city) Please specify</i> <i>Location 3 (small/medium city) Please specify</i> <i>Location 4 (small/medium city) Please specify</i> <i>Location 5 (village) Please specify</i> <i>Location 6 (village) Please specify</i>

<b>II. Internet Service Provider (ISP) being tested</b>	
6. Name of ISP	<i>Please specify</i>
7. URL of ISP	<i>Please specify</i>
8. Is this the incumbent ISP? (Check with your ISP list)	Please select from the dropdown menu

<b>III. Transparency of ISP website</b>	
<p><b>Please indicate now <u>which of the following products</u> is most advertised on the ISP website (ignore other products that do not fall under one of the five product definitions). If several products are advertised similarly, take the one listed first. Mark the product you selected:</b></p> <p><input type="checkbox"/> Product 1: Broadband Internet only (including line rental) with an advertised download speed of: 2 Mbps to 12 Mbps (2,000 Kbps to 12,000 Kbps)</p> <p><input type="checkbox"/> Product 2: Broadband Internet and fixed telephony ('double play') with an advertised download speed of: 2 Mbps to 12 Mbps (2,000 Kbps to 12,000 Kbps)</p> <p><input type="checkbox"/> Product 3: Broadband Internet and fixed telephony ('double play') with an advertised download speed of: 12.1 Mbps to 30 Mbps (12,100 Kbps to 30,000 Kbps)</p> <p><input type="checkbox"/> Product 4: Broadband Internet and fixed telephony and TV ('triple play') with an advertised download speed of: 12.1 Mbps to 30 Mbps (12,100 Kbps to 30,000 Kbps)</p> <p><input type="checkbox"/> Product 5: Broadband Internet and fixed telephony and TV ('triple play') with an advertised download speed of: Faster than 30 Mbps (30,000 Kbps)</p> <p><b>Proceed now to the offer page of this product. If several offers for this product are available (e.g. with different download limits), choose the cheapest one.</b></p> <p><b>Copy the product description:</b></p>	
9. Description of the product, including download speed (copy from website)	<i>Please specify</i>
10. URL of offer website	<i>Please specify</i>
Technical aspects	11. Download speed <i>Please select one option</i> If provided, copy and paste the information
	12. Upload speed <i>Please select one option</i> If provided, copy and paste the information
	13. Download limit/monthly download allowance <i>Please select one option</i> If provided, copy and paste the information

	<p>14. Blocking/throttling of specific websites/services<sup>1</sup>  <i>Please select one option</i>  If provided, copy and paste the information</p>
Availability of price information	<p>15. Standard monthly price  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>16. Line rental  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>17. Activation costs/installation costs  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>18. Additional costs and rebates  <i>Please select one option</i>  If provided, copy and paste the information</p>
Other aspects	<p>19. Contract duration  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>20. Automatic extension of contract after initial duration expired  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>21. Fee for terminating contract before it expires (termination fee)  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>22. Availability of additional online services (e-mail, personal website, personal storage, etc.)  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>23. Availability of online speed test  <i>Please select one option</i>  If provided, copy and paste the information</p>
	<p>24. Availability of customer service hotline  <i>Please select one option</i></p>

<sup>1</sup> This includes the blocking/slowing down of certain internet services such as video streaming, internet telephony etc.

	If provided, copy and paste the information
	<p>25. Price of customer service hotline</p> <p><i>Please select one option</i></p> <p>If provided, copy and paste the information</p>
<p>26. Overall, how clear did you find the information regarding this offer on the ISP website?</p>	<p><i>Please select one option</i></p> <p>Comments</p>



<b>IV. Price of products in different locations – Product 1: Broadband Internet only</b>	
<b>Please search now for each of the five products at six locations, if possible.</b>	
ISP product specifications for <b>Product 1: Broadband Internet only</b> (including line rental) with an advertised download speed of: 2 Mbps to 12 Mbps (2,000 Kbps to 12,000 Kbps).	
27. <b>Location 1</b> (as indicated on first page of questionnaire)	
<input type="checkbox"/> Search for location possible (-> complete section for locations 1 to 6) <input type="checkbox"/> No location search possible (-> use this section to document search results for product 1, and skip locations 2 to 6 for this product)	
Comments	
28. Please indicate download speed used for query:	
<input type="checkbox"/> Search by download speed possible Please specify <input type="checkbox"/> No search by download speed possible	
Comments	
29. What is the <u>name of the tariff as advertised on the website?</u>	Name of tariff: Please specify Copy the description of offer, including the download speed, from the ISP website Please specify
30. Indicate the <u>type of Internet connection</u> of the cheapest correct offer listed. Note: Mobile Internet is excluded.	Please select from the dropdown menu If other, please specify
31. What is the <u>price of this offer?</u> (If several prices are displayed in the list for this offer, specify the <u>most prominently indicated price</u> )	Price: Please specify Currency: Please specify Comments
32. Please specify the type of price. Mark only one option in each category.	<b>Price period</b> Select one option <b>Price type</b> Select one option Comments
33. Does this price include one or more of the following components? Mark all that apply	<input type="checkbox"/> Activation costs/installation costs <input type="checkbox"/> Equipment costs <input type="checkbox"/> Rebates/bonuses <input type="checkbox"/> Line rental <input type="checkbox"/> Other costs Please specify <input type="checkbox"/> Unclear Please specify Comments
34. Is there any text on the website that refers to <u>regional availability</u> of this	Please select one option In case of regional availability only, please specify

product?	
35. Is there any text on the website for this product that refers to <u>price differences/additional charges</u> in different locations?	Please select one option Please specify
<b>Product 1 - Location 2</b>	
36. <i>Please go back to the location search function and search now for the same product specifications for <b>location 2</b>. Is the product available?</i>	
<input type="checkbox"/> Product available for this location <input type="checkbox"/> Product <u>not</u> available for this location (-> go to next location)	
37. What is the <u>price of this offer for this location</u> ?  (If several prices are displayed in the list for this offer, specify <u>the most prominently indicated price</u> )	Price: Please specify Currency: Please specify Comments
38. Is this price identical to the price for this product in location 1?	Select one option  If not identical, specify any information you may find regarding the reason for this price difference Please specify
<b>Product 1 - Location 3</b>	
39. <i>Please go back to the location search function and search now for the same product specifications for <b>location 3</b>. Is the product available?</i>	
<input type="checkbox"/> Product available for this location <input type="checkbox"/> Product <u>not</u> available for this location (-> go to next location)	
40. What is the <u>price of this offer for this location</u> ?  (If several prices are displayed in the list for this offer, specify <u>the most prominently indicated price</u> )	Price: Please specify Currency: Please specify Comments
41. Is this price identical to the price for this product in location 1?	Select one option  If not identical, specify any information you may find regarding the reason for this price difference Please specify
<b>Product 1 - Location 4</b>	
42. <i>Please go back to the location search function and search now for the same product specifications for <b>location 4</b>. Is the product available?</i>	
<input type="checkbox"/> Product available for this location <input type="checkbox"/> Product <u>not</u> available for this location (-> go to next location)	
43. What is the <u>price of this offer for this location</u> ?  (If several prices are displayed in the list for this offer, specify <u>the most prominently indicated price</u> )	Price: Please specify Currency: Please specify Comments

<p>44. Is this price identical to the price for this product in location 1?</p>	<p>Select one option</p> <p>If not identical, specify any information you may find regarding the reason for this price difference Please specify</p>
<p><b>Product 1 - Location 5</b></p>	
<p>45. Please go back to the location search function and search now for the same product specifications for <b>location 5</b>. Is the product available?</p> <p><input type="checkbox"/> Product available for this location</p> <p><input type="checkbox"/> Product <u>not</u> available for this location (-&gt; go to next location)</p>	
<p>46. What is the <u>price of this offer for this location</u>?</p> <p>(If several prices are displayed in the list for this offer, specify <u>the most prominently indicated price</u>)</p>	<p>Price: Please specify</p> <p>Currency: Please specify</p> <p>Comments</p>
<p>47. Is this price identical to the price for this product in location 1?</p>	<p>Select one option</p> <p>If not identical, specify any information you may find regarding the reason for this price difference Please specify</p>
<p><b>Product 1 - Location 6</b></p>	
<p>48. Please go back to the location search function and search now for the same product specifications for <b>location 6</b>. Is the product available?</p> <p><input type="checkbox"/> Product available for this location</p> <p><input type="checkbox"/> Product <u>not</u> available for this location (-&gt; go to next location)</p>	
<p>49. What is the <u>price of this offer for this location</u>?</p> <p>(If several prices are displayed in the list for this offer, specify <u>the most prominently indicated price</u>)</p>	<p>Price: Please specify</p> <p>Currency: Please specify</p> <p>Comments</p>
<p>50. Is this price identical to the price for this product in location 1?</p>	<p>Select one option</p> <p>If not identical, specify any information you may find regarding the reason for this price difference Please specify</p>

**IX. Summary assessment of comparison website**

*Please assess on basis of your experience in searching for offers with this ISP website*

51. How would you rate the user-friendliness of the ISP website?	<i>Please select one option</i> Comments
52. Did you find it easy to compare the technical aspects of different offers listed on the ISP website (speed, download limit, etc.)?	<i>Please select one option</i> Comments
53. Indicate your level of agreement with the following statement: 'I found this ISP website to be useful in allowing me to make an informed choice'.	<i>Please select one option</i> Comments
54. Indicate your level of agreement with the following statement: 'This ISP website provided clear and understandable price information'.	<i>Please select one option</i> Comments
55. Please write any additional comments you have about the ISP website.	<i>Please specify</i>
56. End time	<i>Please specify</i>

## **ANNEX 3: PRICE COLLECTION (COMPARISON WEBSITES)**

*This annex presents the results of the price collection component of the evaluation of comparison websites.*

**Table 12. Results of centralised mystery shopping exercise (price per year)**

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
BE	Product 1	BE CW 01		No price data available		No price data available		No price data available	
	Product 2	BE CW 01		No price data available		No price data available		No price data available	
	Product 3	BE CW 01	<i>Incumbent</i>	527,64	908,76	908,76	527,64	527,64	527,64
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	480,00	419,88	419,88	419,88	480,00	480,00
			<i>Price differential</i>	47,64	488,88	488,88	107,76	47,64	47,64
			<i>Average price differentials</i>		268,26		298,32		47,64
			<i>Price differential index</i>		100,00		111,21		17,76
	Product 4	BE CW 01	<i>Incumbent</i>	623,04	623,04	623,04	623,04	623,04	623,04
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	539,88	504,00	539,88	504,00	539,88	539,88
			<i>Price differential</i>	83,16	119,04	83,16	119,04	83,16	83,16
			<i>Average price differentials</i>		101,10		101,10		83,16
			<i>Price differential index</i>		100,00		100,00		82,26
	Product 5	BE CW 01		No price data available		No price data available		No price data available	
CZ	Product 1	CZ CW 01	<i>Incumbent</i>						
			<i>Currency</i>	CZK	CZK	CZK	CZK	CZK	CZK
			<i>Cheapest correct offer</i>	5028,00	5028,00	5028,00	5028,00	5028,00	5028,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		CZ CW 02	<i>Incumbent</i>	7200,00	7200,00	7200,00	7200,00	7200,00	7200,00
			<i>Currency</i>	CZK	CZK	CZK	CZK	CZK	CZK
			<i>Cheapest correct offer</i>	3588,00	3588,00	3588,00	3588,00	3588,00	3588,00
			<i>Price differential</i>	3612,00	3612,00	3612,00	3612,00	3612,00	3612,00
			<i>Average price differentials</i>		3612,00		3612,00		3612,00
			<i>Price differential index</i>		100,00		100,00		100,00
	Product 2	CZ CW 01	<i>Incumbent</i>						
			<i>Currency</i>		CZK		CZK		
			<i>Cheapest correct offer</i>		8388,00		8388,00		
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		CZ CW 02		No price data available		No price data available		No price data available	
	Product 3	CZ CW 01	<i>Incumbent</i>						
			<i>Currency</i>	CZK	CZK	CZK	CZK	CZK	CZK
			<i>Cheapest correct offer</i>	8628,00	8628,00	8628,00	8628,00	8628,00	8628,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		CZ CW 02		No price data available		No price data available		No price data available	
	Product 4	CZ CW 01		No price data available		No price data available		No price data available	
		CZ CW 02		No price data available		No price data available		No price data available	
	Product 5	CZ CW 01		No price data available		No price data available		No price data available	
		CZ CW 02		No price data available		No price data available		No price data available	
DE	Product 1	DE CW 01	<i>Incumbent</i>	359,40	359,40	359,40	359,40	359,40	359,40
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	344,35	344,35	344,35	344,35	344,35	344,35
			<i>Price differential</i>	15,05	15,05	15,05	15,05	15,05	15,05
			<i>Average price differentials</i>		15,05		15,05		15,05
			<i>Price differential index</i>		100,00		100,00		100,00
		DE CW 02	<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	559	600	660	600	600	600
			<i>Price differential</i>						
			<i>Average price differentials</i>						



Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential index</i>						
		DE CW 03	<i>Incumbent</i>	264,36	264,36	264,36	264,36	264,36	264,36
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	211,80	244,68	244,68	244,68	244,68	264,36
			<i>Price differential</i>	52,56	19,68	19,68	19,68	19,68	0,00
			<i>Average price differentials</i>		36,12		19,68		9,84
			<i>Price differential index</i>		100,00		54,49		27,24
	Product 2	DE CW 01	<i>Incumbent</i>	359,40	359,40	359,40	359,40	359,40	359,40
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	308,75	344,35	344,35	344,35	344,35	344,35
			<i>Price differential</i>	50,65	15,05	15,05	15,05	15,05	15,05
			<i>Average price differentials</i>		32,85		15,05		15,05
			<i>Price differential index</i>		100,00		45,81		45,81
		DE CW 02	<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	254.28	304.68	304.68	303.72	363.72	363.72
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
		DE CW 03	<i>Incumbent</i>	532,32	264,36	532,32	532,32		532,32
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	264,24	244,68	279,36	288,72	364,56	279,36
			<i>Price differential</i>	268,08	19,68	252,96	243,60		252,96
			<i>Average price differentials</i>		143,88		248,28		252,96
			<i>Price differential index</i>		100,00		172,56		175,81
	Product 3	DE CW 01	<i>Incumbent</i>	419,40	419,40	419,40	419,40	419,40	419,40
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	378,50	378,50	378,50	378,50	429,20	378,50
			<i>Price differential</i>	40,90	40,90	40,90	40,90	-9,80	40,90
			<i>Average price differentials</i>		40,90		40,90		15,55
			<i>Price differential index</i>		100,00		100,00		38,02
		DE CW 02	<i>Incumbent</i>	318,48	318,48	318,48	318,48	318,48	318,48
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	244,32	244,32	244,32	244,32	273,72	273,72
			<i>Price differential</i>	74,16	74,16	74,16	74,16	44,76	44,76
			<i>Average price differentials</i>		74,16		74,16		44,76
			<i>Price differential index</i>		100,00		100,00		60,36
		DE CW 03	<i>Incumbent</i>	401,88	311,88	311,88	311,88	484,32	311,88

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	244,68	244,68	249,48	249,48	304,56	304,56
			<i>Price differential</i>	157,20	67,20	62,40	62,40	179,76	7,32
			<i>Average price differentials</i>	112,20		62,40		93,54	
			<i>Price differential index</i>	100,00		55,61		83,37	
	Product 4	DE CW 01		No price data available		No price data available		No price data available	
		DE CW 02	<i>Incumbent</i>	405,48	375,48	375,48	375,48	375,48	375,48
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	339,36	375,48	375,48	375,48	375,48	375,48
			<i>Price differential</i>	66,12	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>	33,06		0,00		0,00	
			<i>Price differential index</i>	100,00		0,00		0,00	
		DE CW 03	<i>Incumbent</i>	426,96	426,96	426,96	426,96	426,96	426,96
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	387,36	387,36	387,36	387,36	387,36	387,36
			<i>Price differential</i>	39,60	39,60	39,60	39,60	39,60	39,60
			<i>Average price differentials</i>	39,60		39,60		39,60	
			<i>Price differential index</i>	100,00		100,00		100,00	
	Product 5	DE CW 01		No price data available		No price data available		No price data available	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
	DE CW 02	<i>Incumbent</i>	576,48	576,48	576,48	576,48	576,48	576,48	
		<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
		<i>Cheapest correct offer</i>	438,48	438,48	438,48	438,48	438,48	438,48	
		<i>Price differential</i>	138,00	138,00	138,00	138,00	138,00	138,00	
		<i>Average price differentials</i>		138,00		138,00		138,00	
		<i>Price differential index</i>		100,00		100,00		100,00	
	DE CW 03	<i>Incumbent</i>	546,96	546,96	546,96	546,96			
		<i>Currency</i>	EUR	EUR	EUR	EUR			
		<i>Cheapest correct offer</i>	485,16	417,36	517,32	485,16			
		<i>Price differential</i>	61,80	129,60	29,64	61,80			
		<i>Average price differentials</i>		95,70		45,72			
		<i>Price differential index</i>		100,00		47,77			
DK	Product 1	DK CW 02	<i>Incumbent</i>						
		<i>Currency</i>	DKK	DKK	DKK	DKK	DKK	DKK	
		<i>Cheapest correct offer</i>	780	1308	1308	1308	1308	2148	
		<i>Price differential</i>							
		<i>Average price differentials</i>							
		<i>Price differential index</i>							
	Product 2	DK CW 02		No price data available	No price data available	No price data available			

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
	Product 3	DK CW 02		No price data available		No price data available		No price data available	
	Product 4	DK CW 02		No price data available		No price data available		No price data available	
	Product 5	DK CW 02		No price data available		No price data available		No price data available	
ES	Product 1	ES CW 02		*					
	Product 2	ES CW 02		*					
	Product 3	ES CW 02		*					
	Product 4	ES CW 02		*					
	Product 5	ES CW 02		*					
FI	Product 1	FI CW 01	<i>Incumbent</i>	286,80	398,04	458,52	358,80	471,84	310,80
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	238,80	398,04	458,52	358,80	471,84	310,80
			<i>Price differential</i>	48,00	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>		24,00		0,00		0,00
			<i>Price differential index</i>		100,00		0,00		0,00
	Product 1	FI CW 02	<i>Incumbent</i>	300,00	408,00	408,00	408,00	408,00	
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	300,00	408,00	408,00	408,00	408,00	
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	
			<i>Average price differentials</i>		0,00		0,00	0,00	

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
			<i>Price differential index</i>							
		FI CW 03	<i>Incumbent</i>	300,00	408,00		408,00			408,00
			<i>Currency</i>	EUR	EUR		EUR			EUR
			<i>Cheapest correct offer</i>	300,00	408,00		408,00			408,00
			<i>Price differential</i>	0,00	0,00		0,00			0,00
			<i>Average price differentials</i>		0,00		0,00			0,00
			<i>Price differential index</i>							
	Product 2	FI CW 01		No price data available		No price data available		No price data available		
		FI CW 02		No price data available		No price data available		No price data available		
		FI CW 03		No price data available		No price data available		No price data available		
	Product 3	FI CW 01		No price data available		No price data available		No price data available		
		FI CW 02		No price data available		No price data available		No price data available		
		FI CW 03		No price data available		No price data available		No price data available		
	Product 4	FI CW 01		No price data available		No price data available		No price data available		
		FI CW 02		No price data available		No price data available		No price data available		
		FI CW 03		No price data available		No price data available		No price data available		
	Product 5	FI CW 01		No price data available		No price data available		No price data available		
		FI CW 02		No price data available		No price data available		No price data available		
		FI CW 03		No price data available		No price data available		No price data available		
FR	Product 1	FR CW 01	<i>Incumbent</i>							

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Currency</i>	EUR					
			<i>Cheapest correct offer</i>	263					
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		FR CW 02		No price data available		No price data available		No price data available	
		FR CW 03		No price data available		No price data available		No price data available	
		FR CW 04		No price data available		No price data available		No price data available	
		FR CW 05		No price data available		No price data available		No price data available	
		FR CW 06	<i>Incumbent</i>	252,00	252,00	252,00	252,00	252,00	252,00
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	252,00	252,00	252,00	252,00	252,00	252,00
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>	0,00		0,00		0,00	
			<i>Price differential index</i>						
	Product 2	FR CW 01		No price data available		No price data available		No price data available	
		FR CW 02		No price data available		No price data available		No price data available	
		FR CW 03	<i>Incumbent</i>						
			<i>Currency</i>			EUR		EUR	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>			394,80		394,80	394,80
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		FR CW 04		No price data available		No price data available		No price data available	
		FR CW 05	<i>Incumbent</i>						
			<i>Currency</i>						EUR
			<i>Cheapest correct offer</i>						442,80
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		FR CW 06	<i>Incumbent</i>						
			<i>Currency</i>		EUR	EUR	EUR		
			<i>Cheapest correct offer</i>		442,80	442,80	442,80		
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 3	FR CW 01	<i>Incumbent</i>	538,80	478,80	538,80	538,80	478,80	538,80
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR



Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	359,88	359,88	359,88	359,88	359,88	359,88
			<i>Price differential</i>	178,92	118,92	178,92	178,92	118,92	178,92
			<i>Average price differentials</i>	148,92		178,92		148,92	
			<i>Price differential index</i>	100,00		120,15		100,00	
		FR CW 02		No price data available		No price data available		No price data available	
		FR CW 03		No price data available		No price data available		No price data available	
		FR CW 04		No price data available		No price data available		No price data available	
		FR CW 05	<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR	EUR	EUR		
			<i>Cheapest correct offer</i>	359,88	359,88	359,88	359,88		
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		FR CW 06		No price data available		No price data available		No price data available	
	Product 4	FR CW 01	<i>Incumbent</i>	466,80	466,80	466,80	466,80	466,80	466,80
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	348,80	348,80	348,80	348,80	348,80	348,80
			<i>Price differential</i>	118,00	118,00	118,00	118,00	118,00	118,00
			<i>Average price differentials</i>	118,00		118,00		118,00	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential index</i>	100,00		100,00		100,00	
	FR CW 02			No price data available		No price data available		No price data available	
	FR CW 03		<i>Incumbent</i>	406,80	406,80	346,80	406,80	478,80	406,80
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	239,76	263,64	263,64	263,64	406,80	406,80
			<i>Price differential</i>	167,04	143,16	83,16	143,16	72,00	0,00
			<i>Average price differentials</i>	155,10		113,16		36,00	
			<i>Price differential index</i>	100,00		72,96		23,21	
	FR CW 04			No price data available		No price data available		No price data available	
	FR CW 05		<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR		EUR		
			<i>Cheapest correct offer</i>	418,80	418,80		454,80		
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	FR CW 06		<i>Incumbent</i>						
			<i>Currency</i>	EUR					
			<i>Cheapest correct offer</i>	382,80					
			<i>Price differential</i>						

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
	Product 5	FR CW 01	<i>Incumbent</i>							
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	395,88	395,88	395,88	395,88	396	396	
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
		FR CW 02		No price data available		No price data available		No price data available		
		FR CW 03		No price data available		No price data available		No price data available		
		FR CW 04		No price data available		No price data available		No price data available		
		FR CW 05		No price data available		No price data available		No price data available		
		FR CW 06		No price data available		No price data available		No price data available		
HU	Product 1	HU CW 01	<i>Incumbent</i>	47880,00		47880,00	47880,00			47880,00
			<i>Currency</i>	HUF	HUF	HUF	HUF	HUF	HUF	HUF
			<i>Cheapest correct offer</i>	34800,00	35640,00	22800,00	34800,00	47880,00		34800,00
			<i>Price differential</i>	13080,00		25080,00	13080,00			13080,00
			<i>Average price differentials</i>		13080,00		19080,00		13080,00	
			<i>Price differential index</i>		100,00		145,87		100,00	

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
		HU CW 02	<i>Incumbent</i>							
			<i>Currency</i>	HUF	HUF	HUF	HUF	HUF	HUF	HUF
			<i>Cheapest correct offer</i>	56340,00	56340,00	56340,00	56340,00	56340,00	56340,00	56340,00
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
	Product 2	HU CW 01	<i>Incumbent</i>	51480,00		51480,00	51480,00			51480,00
			<i>Currency</i>	HUF		HUF	HUF			HUF
			<i>Cheapest correct offer</i>	51480,00		51480,00	51480,00			51480,00
			<i>Price differential</i>	0,00		0,00	0,00			0,00
			<i>Average price differentials</i>		0,00		0,00			0,00
			<i>Price differential index</i>							
		HU CW 02		No price data available		No price data available		No price data available		
	Product 3	HU CW 01	<i>Incumbent</i>	73800,00		73800,00	73800,00			73800,00
			<i>Currency</i>	HUF		HUF	HUF			HUF
			<i>Cheapest correct offer</i>	73800,00		73800,00	73800,00			73800,00
			<i>Price differential</i>	0,00		0,00	0,00			0,00
			<i>Average price differentials</i>		0,00		0,00			0,00
			<i>Price differential index</i>							

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
		HU CW 02		No price data available		No price data available		No price data available		
	Product 4	HU CW 01		No price data available		No price data available		No price data available		
		HU CW 02		No price data available		No price data available		No price data available		
	Product 5	HU CW 01		No price data available		No price data available		No price data available		
		HU CW 02		No price data available		No price data available		No price data available		
IE	Product 1	IE CW 01	<i>Incumbent</i>		604,20		604,20			
			<i>Currency</i>		EUR		EUR			
			<i>Cheapest correct offer</i>	479,40	479,40	479,40	479,40	1008,88	1008,88	
			<i>Price differential</i>		604,20		604,20			
			<i>Average price differentials</i>		604,20		604,20			
			<i>Price differential index</i>		100,00		100,00			
		IE CW 02	<i>Incumbent</i>							
	<i>Currency</i>		EUR	EUR	EUR	EUR	EUR	EUR		
	<i>Cheapest correct offer</i>		540,00	419,40	360,00	360,00	419,40	360,00		
	<i>Price differential</i>									
	<i>Average price differentials</i>									
	<i>Price differential index</i>									
		IE CW 03	<i>Incumbent</i>	329,89	329,89	329,89	329,89	329,89	329,89	
<i>Currency</i>	EUR		EUR	EUR	EUR	EUR	EUR			

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	264,87	264,87	264,87	264,87	264,87	264,87
			<i>Price differential</i>	65,02	65,02	65,02	65,02	65,02	65,02
			<i>Average price differentials</i>		65,02		65,02		65,02
			<i>Price differential index</i>		100,00		100,00		100,00
	Product 2	IE CW 01	<i>Incumbent</i>		532,68		532,68		592,56
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	459,88	459,88	459,88	459,88		480,00
			<i>Price differential</i>		72,80		72,80		112,56
			<i>Average price differentials</i>		72,80		72,80		112,56
			<i>Price differential index</i>		100,00		100,00		154,62
		IE CW 02	<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	480	480	480	480	480	480
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		IE CW 03	<i>Incumbent</i>	659,88	659,88	659,88	659,88	659,88	659,88
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	597,00	468,00	597,00	597,00	656,40	597,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
			<i>Price differential</i>	62,88	191,88	62,88	62,88	3,48	62,88	
			<i>Average price differentials</i>		127,38		62,88		33,18	
			<i>Price differential index</i>		100,00		49,36		26,05	
	Product 3	IE CW 01	<i>Incumbent</i>							
			<i>Currency</i>	EUR					EUR	
			<i>Cheapest correct offer</i>	683.88					744.00	
				<i>Price differential</i>						
				<i>Average price differentials</i>						
				<i>Price differential index</i>						
			IE CW 02	<i>Incumbent</i>						
				<i>Currency</i>	EUR	EUR	EUR	EUR		
				<i>Cheapest correct offer</i>	480,00	480,00	480,00	480,00		
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
		IE CW 03		No price data available		No price data available		No price data available		
	Product 4	IE CW 01		No price data available		No price data available		No price data available		
		IE CW 02		No price data available		No price data available		No price data available		
		IE CW 03		No price data available		No price data available		No price data available		

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
	Product 5	IE CW 01	<i>Incumbent</i>							
			<i>Currency</i>	EUR						
			<i>Cheapest correct offer</i>	1104.00						
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
		IE CW 02		No price data available	No price data available	No price data available	No price data available	No price data available	No price data available	
		IE CW 03		No price data available	No price data available	No price data available	No price data available	No price data available	No price data available	
IT	Product 1	IT CW 03	<i>Incumbent</i>							
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	228,00	228,00	228,00	228,00	228,00	228,00	
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
	Product 2	IT CW 03	<i>Incumbent</i>							
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	343,20	343,20	343,20	343,20	343,20	343,20	
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							



Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential index</i>						
	Product 3	IT CW 03	<i>Incumbent</i>						
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	343,20	343,20	343,20	343,20	343,20	343,20
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 4	IT CW 03		No price data available		No price data available		No price data available	
	Product 5	IT CW 03		No price data available		No price data available		No price data available	
<b>LV</b>	Product 1	LV CW 01	<i>Incumbent</i>	83,40	72,60	83,40	83,40	83,40	83,40
			<i>Currency</i>	LVL	LVL	LVL	LVL	LVL	LVL
			<i>Cheapest correct offer</i>	83,40	72,60	83,40	83,40	83,40	83,40
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>		0,00		0,00		0,00
			<i>Price differential index</i>						
	Product 2	LV CW 01	<i>Incumbent</i>	184,92	184,92	184,92	184,92	184,92	184,92
			<i>Currency</i>	LVL	LVL	LVL	LVL	LVL	LVL
			<i>Cheapest correct offer</i>	184,92	184,92	184,92	184,92	184,92	184,92
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	0,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
			<i>Average price differentials</i>	0,00		0,00		0,00		
			<i>Price differential index</i>							
	Product 3	LV CW 01	<i>Incumbent</i>	215,76	215,76	215,76	215,76			
			<i>Currency</i>	LVL	LVL	LVL	LVL			
			<i>Cheapest correct offer</i>	215,76	215,76	215,76	215,76			
			<i>Price differential</i>	0,00	0,00	0,00	0,00			
			<i>Average price differentials</i>		0,00		0,00			
			<i>Price differential index</i>							
	Product 4	LV CW 01	<i>Incumbent</i>	263,88	263,88	263,88	263,88			
			<i>Currency</i>	LVL	LVL	LVL	LVL			
			<i>Cheapest correct offer</i>	142,80	263,88	263,88	263,88			
			<i>Price differential</i>	121,08	0,00	0,00	0,00			
			<i>Average price differentials</i>		60,54		0,00			
			<i>Price differential index</i>		100,00		0,00			
	Product 5	LV CW 01	<i>Incumbent</i>	323,88	323,88	323,88	323,88			
			<i>Currency</i>	LVL	LVL	LVL	LVL			
			<i>Cheapest correct offer</i>	142,80	323,88	323,88	323,88			
			<i>Price differential</i>	181,08	0,00	0,00	0,00			
			<i>Average price</i>		90,54		0,00			

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
<i>differentials</i>									
<i>Price differential index</i>				100,00		0,00			
NL	Product 1	NL CW 01	<i>Incumbent</i>	300,00	300,00	300,00	300	300	300,00
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	210,00	210,00	210,00	210,00	254,35	254,35
		<i>Price differential</i>	90,00	90,00	90,00	90,00	45,65	45,65	
		<i>Average price differentials</i>	90,00		90,00		45,65		
		<i>Price differential index</i>	100,00		100,00		50,72		
		NL CW 02	<i>Incumbent</i>	300,00	300,00	300,00	300,00	300,00	300,00
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	254,35	254,35	254,35	254,35	254,35	254,35
	<i>Price differential</i>	45,65	45,65	45,65	45,65	45,65	45,65		
	<i>Average price differentials</i>	45,65		45,65		45,65			
	<i>Price differential index</i>	100,00		100,00		100,00			
	NL CW 03	<i>Incumbent</i>	310,00	310,00	310,00	310,00	310,00	310,00	
		<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
		<i>Cheapest correct offer</i>	215,40	215,40	254,35	215,40	254,35	254,35	
<i>Price differential</i>		94,60	94,60	55,65	94,60	55,65	55,65		
<i>Average price differentials</i>		94,60		75,13		55,65			

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
			<i>Price differential index</i>	100,00		79,41		74,08		
Product 2	NL CW 01		<i>Incumbent</i>					360	360	
			<i>Currency</i>					EUR	EUR	
			<i>Cheapest correct offer</i>					270	270	
			<i>Price differential</i>					90,00	90,00	
			<i>Average price differentials</i>						90,00	
			<i>Price differential index</i>							
		NL CW 02		<i>Incumbent</i>	360,00	360,00	360,00	360,00	360,00	360,00
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	284,35	284,35	284,35	284,35	314,35	314,35	
			<i>Price differential</i>	75,65	75,65	75,65	75,65	45,65	45,65	
			<i>Average price differentials</i>		75,65		75,65		45,65	
			<i>Price differential index</i>		100,00		100,00		60,34	
		NL CW 03		<i>Incumbent</i>	395,00	395,00	395,00	395,00	395,00	395,00
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	275,40	275,40	373,75	275,40	373,75	373,75	
			<i>Price differential</i>	119,60	119,60	21,25	119,60	21,25	21,25	
			<i>Average price differentials</i>		119,60		70,43		21,25	
			<i>Price differential index</i>		100,00		58,88		17,77	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
Product 3	NL CW 01	<i>Incumbent</i>						450	
		<i>Currency</i>						EUR	
		<i>Cheapest correct offer</i>					262,05	262,05	
		<i>Price differential</i>							
		<i>Average price differentials</i>							
		NL CW 02	<i>Incumbent</i>	450,00	515,00				
	<i>Currency</i>		EUR	EUR	EUR	EUR	EUR	EUR	
	<i>Cheapest correct offer</i>		263,70	263,70	263,70	263,70	270	270	
	<i>Price differential</i>		186,30	251,30					
	<i>Average price differentials</i>			218,80					
		NL CW 03	<i>Incumbent</i>	515,00	515,00	515,00	515,00		515,00
	<i>Currency</i>		EUR	EUR	EUR	EUR	EUR	EUR	
	<i>Cheapest correct offer</i>		299,40	299,40	299,40	299,40	299,40	299,40	
	<i>Price differential</i>		215,60	215,60	215,60	215,60		215,60	
	<i>Average price differentials</i>			215,60		215,60		215,60	
		<i>Price differential index</i>	100,00		100,00		100,00		
Product 4	NL CW 01	<i>Incumbent</i>	579,00	579,00	570,00	579,00		579,00	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Currency</i>	EUR	EUR	EUR	EUR		EUR
			<i>Cheapest correct offer</i>	299,50	299,50	299,50	299,50		395,00
			<i>Price differential</i>	279,50	279,50	270,50	279,50		184,00
			<i>Average price differentials</i>		279,50		275,00		184,00
			<i>Price differential index</i>		100,00		98,39		65,83
		NL CW 02	<i>Incumbent</i>	577,50	577,50	577,50	577,50		577,50
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	384,35	384,35	384,35	384,50	395,00	395,00
			<i>Price differential</i>	193,15	193,15	193,15	193,00		182,50
			<i>Average price differentials</i>		193,15		193,08		182,50
			<i>Price differential index</i>		100,00		99,96		94,49
		NL CW 03	<i>Incumbent</i>	695,00	695,00	695,00	695,00		
			<i>Currency</i>	EUR	EUR	EUR	EUR		
			<i>Cheapest correct offer</i>	384,35	384,35	384,35	384,35		
			<i>Price differential</i>	310,65	310,65	310,65	310,65		
			<i>Average price differentials</i>		310,65		310,65		
			<i>Price differential index</i>		100,00		100,00		
	Product 5	NL CW 01	<i>Incumbent</i>		699,00	690,00			
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	517,00	390,00	390,00	633,50	633,50	
			<i>Price differential</i>		309,00	300,00			
			<i>Average price differentials</i>	309,00		300,00			
			<i>Price differential index</i>	100,00		97,09			
	NL CW 02		<i>Incumbent</i>		682,50	725,00			
			<i>Currency</i>		EUR	EUR			
			<i>Cheapest correct offer</i>	553,00	390,00	390,00	702,95		
			<i>Price differential</i>		292,50	335,00			
			<i>Average price differentials</i>	292,50		335,00			
			<i>Price differential index</i>	100,00		114,53			
	NL CW 03		<i>Incumbent</i>		815,00				
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	
			<i>Cheapest correct offer</i>	553,00	510,00	510,00	633,50	553,00	
			<i>Price differential</i>		305,00				
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
PL	Product 1	PL CW 01	<i>Incumbent</i>						
			<i>Currency</i>	PLN	PLN	PLN	PLN	PLN	PLN
			<i>Cheapest correct offer</i>	600,00	1908,00	900,00	846,96	1908,00	948,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 2	PL CW 01	<i>Incumbent</i>						
			<i>Currency</i>	PLN	PLN	PLN	PLN	PLN	PLN
			<i>Cheapest correct offer</i>	3872,76	719,40	719,40	719,40	719,40	719,40
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 3	PL CW 01	<i>Incumbent</i>						
			<i>Currency</i>	PLN	PLN	PLN	PLN	PLN	PLN
			<i>Cheapest correct offer</i>	599,40	588,00	588,00	588,00	588,00	588,00
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 4	PL CW 01		No price data available		No price data available		No price data available	
	Product 5	PL CW 01		No price data available		No price data available		No price data available	
<b>PT</b>	Product 1	PT CW 01		No price data available		No price data available		No price data available	
	Product 2	PT CW 01		No price data available		No price data available		No price data available	



Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village	
	Product 3	PT CW 01	<i>Incumbent</i>							
			<i>Currency</i>	EUR	EUR					
			<i>Cheapest correct offer</i>	351,84	351,84					
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
	Product 4	PT CW 01	<i>Incumbent</i>	527,88	527,88	527,88				
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	307,44	415,92	443,88	443,88	443,88	443,88	443,88
			<i>Price differential</i>	220,44	111,96	84,00				
			<i>Average price differentials</i>		166,20		84,00			
			<i>Price differential index</i>		100,00		50,54			
	Product 5	PT CW 01	<i>Incumbent</i>							
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	443,88	443,88	599,88	599,88	779,88	779,88	779,88
			<i>Price differential</i>							
			<i>Average price differentials</i>							
			<i>Price differential index</i>							
SE	Product 1	SE CW 01		No price data available		No price data available		No price data available		

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
		SE CW 02		No price data available		No price data available		No price data available	
		SE CW 05	<i>Incumbent</i>	2508,00	3708,00	3708,00	3024,00	3024,00	3024,00
			<i>Currency</i>	SEK	SEK	SEK	SEK	SEK	SEK
			<i>Cheapest correct offer</i>	1788,00	1788,00		588,00	1788,00	1188,00
			<i>Price differential</i>	720,00	1920,00		2436,00	1236,00	1836,00
			<i>Average price differentials</i>	1320,00		2436,00		1536,00	
			<i>Price differential index</i>	100,00		184,55		116,36	
	Product 2	SE CW 01		No price data available		No price data available		No price data available	
		SE CW 02		No price data available		No price data available		No price data available	
		SE CW 05	<i>Incumbent</i>						
			<i>Currency</i>	SEK	SEK	SEK	SEK	SEK	SEK
			<i>Cheapest correct offer</i>	2016,00	2016,00	2016,00	2016,00	2016,00	2016,00
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 3	SE CW 01		No price data available		No price data available		No price data available	
		SE CW 02		No price data available		No price data available		No price data available	
		SE CW 05	<i>Incumbent</i>						
			<i>Currency</i>	SEK	SEK	SEK	SEK	SEK	SEK

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	3336,00	3336,00	3672,00	3216,00	3336,00	3336,00
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 4	SE CW 01		No price data available		No price data available		No price data available	
		SE CW 02		No price data available		No price data available		No price data available	
		SE CW 05	<i>Incumbent</i>						
			<i>Currency</i>	SEK					
			<i>Cheapest correct offer</i>	3336,00					
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 5	SE CW 01		No price data available		No price data available		No price data available	
		SE CW 02		No price data available		No price data available		No price data available	
		SE CW 05		No price data available		No price data available		No price data available	
<b>SK</b>	Product 1	SK CW 01	<i>Incumbent</i>	206,28	179,88	161,28	161,28	161,28	161,28
			<i>Currency</i>	EUR	EUR	EUR	EUR	EUR	EUR
			<i>Cheapest correct offer</i>	133,20	133,20	133,20	133,20	133,20	133,20
			<i>Price differential</i>	73,08	46,68	28,08	28,08	28,08	28,08

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Average price differentials</i>	59,88		28,08		28,08	
			<i>Price differential index</i>	100,00		46,89		46,89	
	Product 2	SK CW 01		No price data available		No price data available		No price data available	
	Product 3	SK CW 01		No price data available		No price data available		No price data available	
	Product 4	SK CW 01		No price data available		No price data available		No price data available	
	Product 5	SK CW 01		No price data available		No price data available		No price data available	
UK	Product 1	UK CW 01	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP	GBP		
			<i>Cheapest correct offer</i>	318,00	318,00	318,00	318,00		
			<i>Price differential</i>						
			<i>Average price differentials</i>						
		UK CW 02	<i>Incumbent</i>						
	<i>Currency</i>		GBP	GBP	GBP	GBP	GBP	GBP	
	<i>Cheapest correct offer</i>		204,00	148,41	148,41	148,41	222,87	222,87	
	<i>Price differential</i>								
	<i>Average price differentials</i>								
	UK CW 03	<i>Incumbent</i>							
<i>Price differential index</i>									

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
		UK CW 06	<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	148,41	148,41	148,41	148,41	195,60	195,60
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		UK CW 06	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	204,00	148,72	148,72	148,72	222,87	222,87
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
	Product 2	UK CW 01	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP			
			<i>Cheapest correct offer</i>	328,80	328,80	328,80			
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		UK CW 02	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	256,80	102,20	102,20	256,80	256,80	256,80
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		UK CW 03	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	102,20	102,20	102,00	102,20	256,80	256,80
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		UK CW 06	<i>Incumbent</i>					285,20	285,20
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	256,80	256,80	256,80	256,80	256,80	256,80
			<i>Price differential</i>					28,40	28,40
			<i>Average price differentials</i>					28,40	
			<i>Price differential index</i>						
	Product 3	UK CW 01		*					
		UK CW 02		*					
		UK CW 03	<i>Incumbent</i>	230,00	230,00	230,00	230,00	230,00	230,00

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	153,00	153,00	153,00	153,00	230,00	230,00
			<i>Price differential</i>	77,00	77,00	77,00	77,00	0,00	0,00
			<i>Average price differentials</i>		77,00		77,00		0,00
			<i>Price differential index</i>		100,00		100,00		0,00
		UK CW 06	<i>Incumbent</i>	285,20	285,20	285,20	285,20		
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	189,00	189,00	189,00	189,00	229,00	229,00
			<i>Price differential</i>	96,20	96,20	96,20	96,20		
			<i>Average price differentials</i>		96,20		96,20		
			<i>Price differential index</i>		100,00		100,00		
	Product 4	UK CW 01	<i>Incumbent</i>	242,50	242,50	242,50	242,50	242,50	242,50
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	242,50	242,50	242,50	242,50	242,50	242,50
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>		0,00		0,00		0,00
			<i>Price differential index</i>						
		UK CW 02	<i>Incumbent</i>	278,50	278,50	278,50	278,50		
			<i>Currency</i>	GBP	GBP	GBP	GBP		

Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	240,00	240,00	240,00	240,00		
			<i>Price differential</i>	38,50	38,50	38,50	38,50		
			<i>Average price differentials</i>		38,50		38,50		
			<i>Price differential index</i>		100,00		100,00		
		UK CW 03	<i>Incumbent</i>	356,00	356,00	356,00	356,00	356,00	356,00
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	356,00	356,00	356,00	356,00	328,50	328,50
			<i>Price differential</i>	0,00	0,00	0,00	0,00	27,50	27,50
			<i>Average price differentials</i>		0,00		0,00		27,50
			<i>Price differential index</i>						
		UK CW 06	<i>Incumbent</i>	373,20	373,20	373,20	373,20	373,20	373,20
			<i>Currency</i>	GBP	GBP	GBP	GBP	GBP	GBP
			<i>Cheapest correct offer</i>	373,20	373,20	373,20	373,20	373,20	373,20
			<i>Price differential</i>	0,00	0,00	0,00	0,00	0,00	0,00
			<i>Average price differentials</i>		0,00		0,00		0,00
			<i>Price differential index</i>						
	Product 5	UK CW 01		No price data available		No price data available		No price data available	
		UK CW 02	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP			



Country	Product	Comparison website (CW)	Price (local currency)	Locations					
				Metropolitan zone		Large town / urban centre		Rural zone or Village	
				Location 1: Capital city	Location 2: Large city	Location 3: Small/medium city	Location 4: Small/medium city	Location 5: Village	Location 6: Village
			<i>Cheapest correct offer</i>	378,00	378,00	378,00			
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
		UK CW 03		No price data available		No price data available		No price data available	
		UK CW 06	<i>Incumbent</i>						
			<i>Currency</i>	GBP	GBP	GBP			
			<i>Cheapest correct offer</i>	391,75	391,75	391,75			
			<i>Price differential</i>						
			<i>Average price differentials</i>						
			<i>Price differential index</i>						
<b>NO</b>	Product 1	NO CW 01	<i>Incumbent</i>	5284,00	5284,00	5284,00		5284,00	
			<i>Currency</i>	NOK	NOK	NOK		NOK	
			<i>Cheapest correct offer</i>	4895,00	4895,00	4895,00		4895,00	
			<i>Price differential</i>	389,00	389,00	389,00		389,00	
			<i>Average price differentials</i>		389,00		389,00		389,00
			<i>Price differential index</i>		100,00		100,00		100,00
	Product 2	NO CW 01		No price data available		No price data available		No price data available	
	Product 3	NO CW 01		No price data available		No price data available		No price data available	

Country	Product	Comparison website (CW)	Price (local currency)	Locations						
				Metropolitan zone		Large town / urban centre		Rural zone or Village		
				Location 1: Capital city	Location 2: Large city	Location 3: Small/ medium city	Location 4: Small/ medium city	Location 5: Village	Location 6: Village	
	Product 4	NO CW 01		No price data available		No price data available		No price data available		
	Product 5	NO CW 01		No price data available		No price data available		No price data available		

Source: Mystery shopping results. Results are for the 38 comparison websites that permitted mystery shoppers to search at the city level or more specifically - e.g. by post code, phone number or address. <sup>196</sup> in the table refers to the fact that data provided was not comprehensive enough to determine final, comparable, prices for both the incumbent and the cheapest correct offer.