

## Communications Consumer Panel and ACOD response to the Consumer Council for Northern Ireland Draft Forward Work Programme for 2018/2019

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The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to comment on the Consumer Council's consultation on its work programme for 2018/2019.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Response

We welcome the breadth and clarity of your work programme's ambition as you seek to represent Northern Ireland consumers across a range of markets. We will limit our response to those aspects within the statutory remit of the Communications Consumer Panel.

### Mail Market

Regarding the work programme page 27, 28 sections 5.53-5.57 and page 42: *"To investigate the impact and value of the Postal Universal Service Provision for NI consumers and businesses"*. The Panel welcomes CCNI's continuing role as an advocate for NI Postal Consumers. The ongoing work outlined with the UK Consumer Protection Partnership (CPP), making parcel surcharging a priority project is most welcome. We have noted with concern the research from Ofcom and Citizens' Advice Scotland highlighting the challenges faced by some consumers in the unregulated parcel markets.

We look forward to outcomes from the CPP role in seeking possible mitigations for consumers.

Your investigation of the impact and value of the USO postal service provision for NI consumers and businesses sits well alongside the possible detriment in non-USO markets. Ofcom's research in their annual Communications Market Report will undoubtedly assist in providing information on residential and business consumers in Northern Ireland.

## Broadband

Regarding the work programme page 40 *Broadband Quality of Service: "To examine the standard of customer service offered by broadband and telecom providers in Northern Ireland"*. We believe it may be worth clarifying which area of the service this means. Is your work on quality of *customer* service encountered when a consumer needs to contact their provider with an inquiry or complaint? Or quality of *technical* service i.e. broadband speeds, latency, jitter, reliability and other technical issues. It may be worth clarifying if you mean one or the other or indeed both.

Ofcom has research/data on quality of customer service (including alternative dispute resolution) and the technical quality of the service.

You may be interested in the Panel's qualitative study on complaint handling, which is in the final stages of completion. The research includes a boosted sample size to ensure that we have data from Northern Ireland consumers. We will be pleased to share it or present it in person if desired.

## Conclusion

The Communications Consumer Panel welcomes the Consumer Council's ongoing work on behalf of Northern Ireland consumers and the insights gained through the Council's cross cutting work in regulated and unregulated markets.

In summary, we look forward to continuing to work closely in partnership. In both our areas of work, it is vital that we protect and promote the interests of citizens and the inactive, silent or more vulnerable consumer - as well as those who are more engaged.