**The Panel’s UK-wide Consumer Stakeholder Hub – May 2021: The potential impacts of migration to voice-over IP on consumers, citizens and micro-businesses.**

In May, we brought together for the first-time participants from our four National Hubs – consumer, citizen and micro business focused organisations from across the UK.   
The session was held as an interactive webinar, focusing solely on migration to VoIP (Voice over Internet Protocol) – the significant upcoming change to the telephony network that is due to take place by 2025, also known as migration to all-IP networks, or analogue to digital telephony switchover. Migration to VoIP will result in the closure of the ‘public switched telephone network’ (PSTN) as traditional copper line phone services are gradually migrated onto newer digital technology, which carries calls over a broadband connection. By December 2025, it is forecast that all homes and businesses will have been migrated to an all-IP based network for broadband and voice connectivity.

Many consumers, citizens and micro-businesses are likely to be impacted by the migration – particularly those who rely on services that could be affected by the switchover such as telecare devices, security alarms and payment mechanisms. We also know that landline-only users tend to be older, disabled, living in rural areas and on a lower income. The Panel has been engaging with industry and others, highlighting that the switchover needs to be carefully managed by raising awareness of the impending changes and identifying consumers who might need additional support during the migration process. We considered that a UK-wide Hub would be a useful platform to share nationwide information on the migration and understand the potential impacts on consumers, citizens and micro-businesses across the UK.

**Presentations from experts**

As part of this session, we heard from Openreach’s ALL IP Industry Engagement Manager who provided participants with an overview of the migration process and Digital Office for Scottish Local Government’s Business Relationship Manager (Digital Health & Care) provided an overview of their [digital telecare programme in Scotland](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftelecare.digitaloffice.scot%2F%3Fslug%3Ddigital-telecare&data=04%7C01%7CChloe.Newbold%40ofcom.org.uk%7Cb9bd052724ee4af2236d08d9139afe36%7C0af648de310c40688ae4f9418bae24cc%7C0%7C1%7C637562378680451176%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0&sdata=qT09ptPlTWdLgxS7x0ZiLjpk53jzZgT%2FH0jKH%2BLPgUc%3D&reserved=0) including current progress and any challenges experienced so far. Participants had an opportunity to ask questions and discuss the potential impacts on the consumers, citizens and micro-businesses they represent and suggest any steps that industry could take to protect consumers throughout the migration process.

Outlined below are the key messages that emerged during our discussions. You can also find a list of stakeholders who took part and some key links to further information on the migration process.

1. **Digital connectivity needs to be universal, reliable and resilient, particularly for people living in rural areas who currently rely on landline services to interact with others.**
2. **A coordinated consumer communications campaign is essential to help raise awareness of migration to voice-over IP so consumers, citizens and micro-businesses can prepare for the switchover; and planning this should begin immediately with input from consumer, citizen and micro business representatives from an early stage.**
3. **Communications providers need to better understand which of their customers have specific access requirements so that those people can be safeguarded throughout the migration process to mitigate potential harm to them.**

A full summary of our discussions and those who took part can be found below.

1. **Digital connectivity needs to be universal, reliable and resilient, particularly for people living in rural areas who currently rely on landline services to interact with others.**

* The digital telephony switchover will require all households to have a digital connection for telephone access, which will have citizen equality implications.
* A significant proportion of people do not have access to the internet and rely on their landline service to connect with others.
* Farmers living in rural areas with no digital connectivity rely on landline connectivity to tackle isolation.
* Annual data shows that 10% of citizens in Wales do not personally use the internet.[[1]](#footnote-1)
* Farmers have been quoted significant costs for a fibre or broadband connection under the USO.
* UK Government has committed to delivering 85% fibre coverage by 2025, which runs in parallel with the switchover deadline. However, connectivity concerns were raised for the remaining 15% of premises and how connectivity costs would be met.
* Fibre to the Cabinet is currently available to 95% of premises across the UK and local councils are focused on raising consumer awareness of available connectivity schemes.
* People living in rural areas commonly experience unreliable connections. Though, post-migration, fibre connectivity is anticipated to be more resilient and reliable.
* In areas where digital connectivity is not available, providers may be able to offer a copper alternative, but this would be on a case-by-case basis.
* It is hoped that the switchover will drive competition across the telecoms market and result in lower costs for consumers, citizens and micro-businesses.
* Government teams working on digital connectivity projects across the UK should feedback any learnings to each other.

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* The migration deadline of 2025 is not far away yet many consumers are unaware of the migration and the timeline will have been further impacted by the pandemic.
* The language surrounding the switchover needs to be consumer-friendly, in plain English and accessible formats.
* Some existing equipment will not be compatible following the migration and will need to be replaced. Further clarity on any potential cost implications should be included in a communications campaign.
* Consumer, citizens and micro-businesses should be directed to undertake an inventory of any home or business equipment that relies on PSTN; and to discuss with their provider whether the equipment will work post-migration and, if not, the options available e.g. upgrade.
* Some routers will include an analogue adapter, but this is unlikely to be consistent across all providers. Communications comparison sites should be encouraged to specify whether routers would include an adaptor for legacy analogue equipment to be plugged in.
* Retail stores had previously been cited as places for consumers to test equipment. CPs also had testing labs across the UK. However, the impacts of the Covid-19 pandemic had delayed progress.
* The migration process could be exploited by scammers capitalising on consumers’ lack of knowledge/confusion, industry, Ofcom, governments and consumer bodies need to work together to prevent this.
* The Panel’s research on consumers’ awareness and understanding of migration to VoIP and any potential impacts on consumers, citizens and micro-businesses had found that information on the migration should be accelerated across consumer and PSTN-reliant business networks.
* Ofcom colleagues highlighted that stakeholder engagement was ongoing to raise awareness of the migration.
* The Panel continued to engage with DCMS, Ofcom, BSG and others on this topic.

1. **Communications providers need to better understand which of their customers have specific access requirements so that those people can be safeguarded throughout the migration process to mitigate potential harm to them.**

* Many consumers find digital connectivity or devices difficult to access e.g. lack of digital skills or confidence, accessibility and/or usability issues, affordability.
* Ensuring that new equipment is inclusive by design should be a statutory requirement.
* To mitigate any potential impacts of the migration on consumers with specific access requirements, early intervention along with prevention of harm will be imperative.
* In healthcare, switching to digital would allow data to be shared more widely and could play a significant role in preventing harm from occurring by analysing data and adopting innovative practices e.g. monitoring biometrics.
* Some D/deaf consumers receive support equipment via social services, which might not be compatible following the switchover. Openreach has engaged extensively with relevant organisations to highlight the impending changes and action required.
* Post-migration, if preparation had not taken place, many consumers would be left with no connectivity during a power outage and this could cause particular harm to consumers who are isolated e.g. rural consumers, and people with access requirements.
* CPs will be required to provide consumers who are identified as at risk with free battery back-ups to enable them to make emergency calls for a minimum of one hour during a power outage.[[2]](#footnote-2) It was highlighted that a significant number of consumers who require additional support would not be registered with their CPs due to being unaware of available support services or not identifying with CP’s eligibility terminology e.g. a ‘vulnerable’ customer.
* Many consumers with access requirements e.g. d/Deaf consumers, would not classify themselves as ‘vulnerable’ and therefore not registered with their CPs, but can be easily be identified by the communications services they use.
* CPs were responsible for identifying which of their customers were ‘vulnerable’ and might need additional support during the migration. It was pointed out by a participant that expecting CPs to proactively seek to identify more vulnerable consumers could be considered a conflict of interest and an independent body should have oversight.
* CPs need to anticipate requirements under the Equality Act and [Ofcom’s General Condition C5,](https://www.ofcom.org.uk/__data/assets/pdf_file/0021/112692/Consolidated-General-Conditions.pdf) which aims to ensure that providers consider the needs of people with disabilities and vulnerable consumers The UK also adheres to the UN Convention on the Rights of Persons with Disabilities.
* It was flagged that a significant number of consumers aged 75 and over do not have access to the internet and are unlikely to be registered with their provider as ‘vulnerable’.[[3]](#footnote-3)

**For further information on migration to VoIP, you can access** [**Openreach’s website by clicking here**](https://www.openreach.com/upgrading-the-UK-to-digital-phone-lines/call-waiting-list)**.**

**You can sign-up and receive updates from Openreach on the switchover** [**by clicking here.**](https://www.openreach.com/upgrading-the-UK-to-digital-phone-lines/call-waiting-list)

**Stakeholders who contributed to the discussions are listed below.**

* **Ofcom**
* **Ofcom’s Advisory Committees**
* **Older People’s Commissioner for Wales**
* **Mind**
* **Money Advice and Pensions Service**
* **National Association of Deafened People**
* **National Farmers’ Union**
* **National Federation of the Blind UK**
* **NI Council on Voluntary Action**
* **RNIB**
* **Rural Health and Care Wales**
* **Scottish Government**
* **Society of Chief Officers of Trading Standards in Scotland**
* **Ulster Farmers’ Union**
* **Welsh Government**
* **Which?**
* **Advice Direct Scotland**
* **Age Cymru**
* **Carers Wales**
* **Citizens Advice Cymru**
* **Citizens Advice Scotland**
* **CMA**
* **Consumer Council for Northern Ireland**
* **COSLA**
* **Countryside Alliance**
* **Deafscotland**
* **Digital Office for Scottish Local Government**
* **Farmers’ Union Wales**
* **Federation of Small Businesses**
* **ILC-UK**
* **Independent consumer consultants**

1. [Welsh Government: Internet skills and online public sector services national survey Wales (April 2019- March 2020)](https://gov.wales/internet-skills-and-online-public-sector-services-national-survey-wales-april-2019-march-2020-html) [↑](#footnote-ref-1)
2. [Ofcom guidance: Protecting access to emergency organisations when there is a power cut at the customer's premises](https://www.ofcom.org.uk/__data/assets/pdf_file/0016/123118/guidance-emergency-access-power-cut.pdf) [↑](#footnote-ref-2)
3. [Age UK: Nearly two million over 75s in England are still digitally excluded in a Covid-19-world](https://www.ageuk.org.uk/latest-press/articles/2021/nearly-two-million-over-75s-in-england-are-still-digitally-excluded--in-a-covid-19-world/) [↑](#footnote-ref-3)