

Dame Patricia Hodgson, DBE  
Chairman  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

26 February 2016

Dear Dame Patricia

### **Ofcom Proposed Annual Plan 2016/17**

I am writing to set out the response of the Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) to Ofcom's proposed Annual Plan - the new format of which we welcome.

Communications services, in all their forms, play an ever-important part in people's lives. The Panel exists to ensure that the needs of consumers, citizens and micro businesses are fully promoted and protected by providing an independent voice for these groups. We therefore welcome that consumers are at the heart of the Plan, and we encourage Ofcom to ensure that the consumer is in its mind throughout every area of its work.

We also welcome the recent publication of the Initial Conclusions from the Strategic Review of Digital Communications. We look forward to examining the document further and look forward to working with Ofcom and providers to ensure that the detail delivers on the broader aims.

The recent Consumer Experience Report identified, rightly, that communications markets are broadly serving most consumers well. But the Panel shares Ofcom's belief, as articulated in the initial conclusions from the Strategic Review, that there is still much to be done, not least in areas such as:

- Coverage and quality of service (broadband and mobile);
- Switching and clarity of information;
- Nuisance calls;
- Customer service and treating consumers fairly; and
- Access services.

### **Communications Consumer Panel**

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## ***Changes in the Market***

Telecommunications is now rightly regarded as the fourth utility but the market is undergoing significant change - mergers, the advent of quad play, the Internet of Things and 5G all offer fantastic opportunities to benefit consumers; they also have the potential for confusion and consumer harm.

Trust is therefore a vital component of an effective market. Consumers need to be able to trust their providers - trust that they will behave fairly; give a good service; be careful custodians of consumer data; protect privacy etc. We would like to see a greater acknowledgement of this in the Plan - it will help set the tone for all stakeholders. Under the heading "Changing consumer and business needs" we feel it would also be useful to take into account the growth in financial transactions (online and via mobiles) and the momentum towards digital by default. These areas underline even further the need for ubiquitous access to high quality services across all networks.

Under point 2.11, we welcome that the planned public switched telephone networks (PSTN) switch off is mentioned. However we believe that the implications of this could be expanded, with explicit mention of the potential effect on some older and/or disabled people - many of whom may rely on the PSTN in all sorts of ways, and who may be uncertain about newer technologies. The Plan could set out a little more forward thinking on this.

## ***Ofcom's role***

We encourage Ofcom to move as quickly as possible in taking clear and robust decisions to help consumers, citizens and microbusinesses make the very most of a thriving and competitive market. When the market does fail its consumers (for example sub-optimal mobile coverage, unreliable broadband), we believe that Ofcom must be flexible and nimble enough to act quickly and decisively so that consumers' and citizens' interests are both protected and promoted. So we would urge Ofcom to consider further how it might best use its powers in the case of market failures. Generally, the Panel would also welcome more emphasis in Ofcom's approach on identifying where it can use its position and expertise to facilitate or encourage other stakeholders working in a given area to address policy challenges.

We note the high level goals in the proposed Plan: to promote competition and ensure that markets work effectively for consumers; to secure standards and improve quality; and to protect consumers from harm. We note, too, the distinction from previous years' plans in which Ofcom has stated that it "...will work for consumers and citizens by promoting effective competition, informed choice and the opportunity to participate in a wide range of communications services, including post" and "will provide proportionate protection for

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consumers”. It may be a presentational issue, but the emphasis seems to have shifted slightly. We wonder if the first goal would strengthen the consumer agenda if it said “provide quality and choice by ensuring that competitive markets work effectively for all consumers”?

We were pleased to note the reference to working with consumer bodies and advocacy groups, including the Panel, in 5.11. Much of the Panel’s work takes place during the development of policy and behind the scenes, where we aim to offer expert advice and constructive challenge. It is the Panel’s view that broad consumer representation and input is invaluable because of the unique insight that it can deliver beyond that gleaned from research. We look forward particularly to working closely with you on the review of the General Conditions. As our membership represents the specific interests of all four UK nations, we particularly welcome Section 4 of the Plan outlining Ofcom’s specific work and engagement in the nations. Sections 4.11 and 4.15 refer to preparing to appoint Ofcom Board Members for Scotland and Wales. We think that there ought to be a similar ambition expressed for Northern Ireland. Consumers deserve equal representation across the nations and regions.

### ***Panel views on priorities/work areas***

#### ***Coverage and quality of service***

In the Panel’s view, universally consistent coverage must be the aim for both fixed broadband and mobile voice and data services. Anything less risks exclusion - thus consumer harm - for large numbers of people. This is especially important as we move to a ‘digital by default’ model of access to many government services.

Under point 3.13 we would encourage Ofcom to aim for ubiquitous availability rather than widespread availability. Similarly in 3.16 - notwithstanding where Openreach resides structurally - we believe that Openreach’s current minimum service standards are insufficiently challenging. We would prefer the Plan to say that those minimum standards- which we also believe should be targets, not merely standards - will be reviewed and re-set to better reflect consumer needs. In a similar vein, we would urge Ofcom to seek to secure ‘high’ standards across the market - not just for content (3.15).

The Panel believes that there should be much greater (and ideally 100%) mobile coverage for all consumers - including indoor, road and rail coverage. Rural areas also experience disproportionate problems with mobile coverage: only 55% of the UK’s total land area is covered by all four operators to give a basic (2G) voice service. Coverage inside buildings tends to be worse than outside, and indoor coverage in rural areas is particularly poor. So while 72% of rural premises in the UK have voice call coverage from all networks outdoors,

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only 31% of rural premises have the same level of coverage indoors. And 13% of rural premises have no coverage at all indoors, with 3% having no coverage at all outdoors.

We recommend close monitoring of the 4G coverage obligations and the MNOs' undertakings and we urge Ofcom to encourage MNOs to develop contingency plans for the very predictable areas which might be adversely affected; to explore avenues for innovation across new and existing resources and to continue to support market based solutions that, with a limited regulatory intervention, could deliver immediate and significant benefit to the economy.

We would strongly encourage Ofcom to undertake work to establish an agreed and commonly used definition of what constitutes an acceptable threshold level for making 2G voice calls. If the fundamental measurement of coverage is under-estimated, then coverage measures are seriously undermined in any event: Ofcom's drive testing research conducted for 2014's Infrastructure Report identified that a signal level of at least -86dBm was needed to provide good 2G voice call coverage. Mobile operators use a lower (-93dBm) signal threshold to determine 2G voice call coverage. While it is possible to make calls at these lower signal levels, it is more likely from the drive test results to lead to consumers experiencing interrupted and/or dropped calls. While Ofcom's most recent research supports the historic use of -86dBm for traditional phones, a more realistic threshold for modern smartphones is -81dBm.

As we note above, the ubiquitous availability of fast, robust broadband is crucial to consumers, citizens and microbusinesses. Whilst speed alone does not guarantee a high quality user experience, the Panel considers that 10 Mbit/s is the absolute minimum for an acceptable broadband user experience. But according to Ofcom's Connected Nations Report 2015, 8% of UK premises are unable to reach speeds of 10 Mbit/s; 2% are unable to achieve 2Mbit/s. The problem is worse in rural areas, where 48% of premises - approximately, 1.5 million households - are unable to achieve download speeds of 10Mbit/s; and 9% are unable to achieve 2Mbit/s. The Panel welcomed the DCMS' announcement last year regarding a Universal Service Obligation (USO) of 10 Mbit/s and we look forward to seeing an implementation plan as soon as possible. We welcome that Ofcom will be fully supporting the Government in taking forward implementation plans in this area as noted in 3.17.

### ***Market Consolidation***

The Panel is concerned that the position of all UK telecommunications consumers is not weakened in any way by consolidation in the mobile market. The execution of such deals after the physical network sharing deals of the last decade means that there are very few legitimate cost efficiencies available that are beneficial for consumers. There is a danger that such mergers could be driven by a desire to reduce the competitive intensity of the UK mobile market, to allow prices and margins to rise for the benefit of operators and at a cost

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to consumers. In our view, beyond benefitting the companies involved - which should not alone be grounds for approving such deals - we have yet to see any credible reasons why such mergers should be allowed to proceed.

### ***Postal services***

We believe that it is vital to maintain a universal postal service that meets the needs of all consumers. This must be financially sustainable, fit for purpose and, crucially, affordable - recognising both changes in market conditions and in consumer behaviour (both residential and microbusiness customers). We continue to encourage clarification of the definition of the term “regulated postal operator” - and we are pleased to see that Ofcom intends to review this as part of its wider review of Royal Mail’s regulation. We believe that clearer terminology will make it easier for consumers to understand their rights and how to assert them.

Given the absence of any meaningful competition, the Panel believes that consumers need to have a strong and active voice in the market. Continued progress on Royal Mail’s efficiency is vital - so that cost management and reduction can link directly to sustaining the universal service at an affordable price for all who choose, or need, to use it - including people on lower incomes and those who live or work in harder to reach addresses.

We note that the parcels market is growing. However 45% of consumers have not ordered on a specific occasion because of a concern about delivery.<sup>1</sup> This is a particular issue for consumers in Northern Ireland and the Consumer Futures 2013 report, *Signed, sealed... delivered? Research into parcel delivery issues in remote locations* found evidence across England, Wales and Northern Ireland that some consumers experience problems with their parcel deliveries. Specifically, online shoppers living in some postcode areas experience a range of delivery issues both during and after online shopping, including higher cost for delivery, longer delivery times and no deliveries.

We welcome that during 2016/17 Ofcom will publish the results of its fundamental review into the regulation of Royal Mail. It is vital that Ofcom continues to ensure that the postal services provided are high quality, affordable and accessible. We believe, too, that access to redress when complaints are unresolved should be well promoted and easy to use. To this end, in addition to the other workstreams, we would urge the close monitoring of quality of service targets and robust enforcement action if these are not met.

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<sup>1</sup> [http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr15/UK\\_6.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr15/UK_6.pdf)  
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### ***Switching and Clarity of information***

As last year, we welcome Ofcom's plans to *improve consumers' ability to switch*, but are very concerned about the time these initiatives are taking to implement. Low switching levels lead to reduced competition and a worse deal for consumers - this situation should not be allowed to endure - particularly in the context of increasing consolidation in the mobile market. Consumers need to be aware of the potential benefits of switching and to have confidence that switching will be a hassle-free process with effective "safety nets" to mitigate against loss of services.

Robust switching processes are the bedrock of improved switching, but they are not sufficient by themselves. As we have said previously, consumers need to be able to make an informed decision, and be assured that they will not incur excessive cost, time or disruption as a result of a decision to switch. We therefore welcome the continuation of the work into non-process barriers to switching and hope that this can progress apace.

Accessible, accurate and digestible information is key. Awareness of trusted sources of information is lower among older consumers in each market. The proportion of consumers aged 65+ who are unaware of any trusted sources of information is about double the average in each market - ranging from 5% in the bundled services market to 26% in the fixed line market.

The provision of information about providers' performance is vital to informing consumers' decision making, to encouraging providers to maintain or improve performance and to improve transparency and trust within the sector. Ofcom has a key role in helping consumers to assess their options by providing information in easily digestible and accessible formats which can be picked up and widely promoted by the press and online sources. The new 'leaderboard' graphic employed in the quarterly complaints publication is a fine example of how to make this area more engaging and accessible for consumers. Ofcom has a number of opportunities for this kind of information dissemination and it must ensure that it utilises the platforms available - including social media - and provides journalists, bloggers, consumers and citizens with the tools to ensure that everyone can engage with and understand the data it publishes.

Ofcom's strategic aim should, we believe, be harmonised switching processes for all communications services such as mobile, pay TV and cable services. The Panel would also encourage consideration of what steps could be taken to facilitate switching for consumers in groups that are less likely to do so - particularly for consumers in more vulnerable circumstances - and to support them, where needed, through the process. It is essential that this issue continues to receive priority.

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## ***Nuisance calls***

Despite some progress, nuisance calls/texts from businesses - including live marketing calls, silent calls, abandoned calls, and recorded marketing message calls - remain a major cause of consumer irritation, anxiety and distress. They can also cause micro businesses to waste their resources. The potential loss of people's trust in their communications service is bad both for consumers, businesses and the industry as a whole. Ofcom's estimate of about 5 billion nuisance calls a year is shocking - in all senses of the word. We recognise that it is a tough problem to crack, but the harm to consumers is immense and we would like to see Ofcom give the matter even more priority by acting quickly and using its full powers to improve the situation for consumers.

The Panel has welcomed Ofcom's review of its statutory policy statement on the exercise of its powers relating to the persistent misuse of electronic communications networks and we have responded to recent consultations on the subject<sup>2</sup>. We do not need to rehearse the detail here - the evidence of harm is well known. However, as highlighted by Ofcom's research, older people are significantly more likely to be affected by the incidence of nuisance calls. Silent and abandoned calls are a nuisance to consumers as a whole, but may cause more harm to people who rely solely on their landline, as they will not have alternative messaging channels such as email, IM and text. Ofcom's Consumer Experience report, published earlier this month, showed that the 10% of the UK population living in fixed, voice-only households were more likely to be older people and people on lower incomes<sup>3</sup>.

This issue remains a key priority for the Panel and we believe Ofcom should be bold and robust in its enforcement against persistent misuse, especially to protect consumers in the most vulnerable circumstances. To that end we also supported the update to Ofcom's penalty guidelines in 2015. It is vital that any penalties imposed by Ofcom as a result of non-compliance are meaningful in terms of their impact and are not considered by those in breach as merely a potential 'overhead' of doing business in such a way.

In tackling the persistent misuse of Calling Line Identification (CLI), Ofcom will help consumers to identify callers and reject calls from disreputable companies. However, for consumers to truly benefit from the proposed display of CLI on calls from direct marketing companies and be able to make an informed decision about whether to answer a call, they must be able to see immediately what that number is. The Panel has urged the provision of free caller line identification (CLI) by default for consumers. We would encourage Ofcom to do all that it can to support this proposal. The Panel believes that, since it is the service

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<sup>2</sup> <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-ofcom-persistent-misuse-23-feb-2016-final.pdf>

<sup>3</sup> [http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-15/CER\\_2015\\_FINAL.pdf](http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-15/CER_2015_FINAL.pdf)



provided by telephone companies, and paid for by the consumer, that is being abused then it is logical for CLI - one of the main available defence mechanisms against nuisance calls - to be freely available to all consumers. Additionally, the CLI service can be used to report nuisance calls to regulators as well as being critical for the effective use of handsets and services that rely on caller display to block and filter certain calls. Particularly in light of the Government's drive to ensure the provision of CLI, we cannot see how some communications providers can continue to justify charging for CLI, especially when others provide CLI to all their customers free of charge.

To help reduce both the incidence and the impact of nuisance calls/texts including silent calls and unrequested marketing calls and texts, we would urge Ofcom to continue to work with a range of partners. We believe that, in order to maintain momentum and help gain consumer confidence, the agencies involved should report and publicise the actions that have been taken/are planned on a more regular basis. The current Plan refers to a revised statement of policy to be published in Q3/4 of 2015/16. We would also welcome an explicit reference to Ofcom's ongoing consumer information work with consumer groups and again urge a more specific focus on the needs of more vulnerable consumers.

### ***Customer Service and treating consumers fairly***

The Panel has an ongoing concern about customer service standards. Our recent research [\*Inclusive Communications: We're Not All the Same\*](#)<sup>4</sup> has highlighted many of the customer service issues we originally identified in our 2013 research [\*Going round in circles? The consumer experience of dealing with problems with communications services\*](#)<sup>5</sup>.

[\*Inclusive Communications: We're Not All the Same\*](#) also highlights the greater significance that communications services can have for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability. They can help to reduce vulnerability by giving people access to information and services they cannot easily obtain through other channels, and by facilitating participation and inclusion. However our research also highlighted that:

- Inflexible customer service responses and poorly trained customer service agents can cause problems and frustrations
- Systems-related issues such as passwords and call routing systems can act as barriers to inclusion

<sup>4</sup> <http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications>

<sup>5</sup> <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles.pdf>

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- There is a lack of awareness - among service users and some communications providers' staff - of specific rights for disabled people relating to equivalent access
- People use a variety of strategies to help overcome barriers to inclusion
- Some (but certainly not all) think that disclosing their impairment is a useful strategy to get a better experience
- Being assertive and making complaints are other ways of combating poor treatment but many were reluctant to switch

We are currently arranging a series of roundtables to discuss the key recommendations made by the Panel. We believe that, inter alia, with an aging population the need to support people acting on behalf of others via a Power of Attorney will be a growing issue, to which communications providers and others need to respond. We would encourage Ofcom to ensure that it has a strong focus on issues of diversity and inclusion. One such example would be ensuring full compliance with GC15 and encouraging communications providers to promote services available under GC15 to **all** their customers (as in the energy sector), to ensure that people in need of additional support do not miss out.

We particularly welcome, under the priority to *protect consumers from harm*, reference to Ofcom's ongoing programme to drive improvements in the area of complaints handling, including ensuring that providers make consumers aware of ADR. We welcome the action plans secured from providers to deliver improvements within six months. We would urge Ofcom to be stringent in its assessment of the success or otherwise of these plans and audit communications providers' processes to ensure compliance.

We have been especially concerned about communications providers' referral of complaints to the ADR Services and we will continue to call for the shortening of the eight week referral period, greater publicity of the Services and publication of information about ADR complaints. Our proposal is that accurate complaints data from the ADR services should be published regularly in a form that is digestible and useful to consumers, so that all consumers and micro businesses can be aware of the performance of their providers and engage more with the market. The data should be in a common format across the ADR Schemes and should, in our view, include: -

- The number of complaints referred to ADR per communications provider.
- The main types of complaint.
- The number of complaints upheld.
- The average financial award.

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- The number of complaints accepted where a communications provider has failed to provide either a “deadlock letter”, or an “eight week” notification of the consumer’s eligibility to use ADR.

We believe that this would complement Ofcom’s published complaints data; would provide an incentive for communications providers to improve performance; and, most importantly, would enable consumers to better assess the quality of customer service on offer from their providers. This would in turn help them make informed decisions about their choice of provider, switching and exercising their right to redress. It would also raise awareness of the ADR services.

The Panel is concerned about some consumers who are more likely to be disproportionately affected by industry trends and who do not seem best served by the market. Stand alone voice consumers - 10% of UK households - are a key issue for the Panel, as we raised in last year’s response to Ofcom’s draft Annual Plan. Major providers have increased line rentals from between 23% and 44% since 2010, whilst wholesale costs have reduced significantly. A majority of these consumers are elderly (78% over 65) and on low incomes. These consumers are also affected by decreasing savings offered on advance line rental and rising call costs. Additionally, promotional pricing may lead to those who are not engaged in the market paying higher prices. Increasingly complex pricing makes it harder still for people to compare prices and get the best deals and, as we have seen in other markets, this can be a cause of market disengagement by consumers.

We have been concerned for some time about the lack of consumer protection from high bills run up on lost or stolen mobiles and were encouraged by the implementation of the liability cap by all major MNOs during 2015. However the position is not the same amongst all virtual MNOs. We have written to the major MVNOs and will be writing to DCMS in the near future to highlight this inconsistency which risks confusion amongst consumers.

While at 2%, the number of consumers who are behind on their payments by one month or more in the last year is relatively low<sup>6</sup>, we would suggest that there is a role for Ofcom to ensure that communications providers are following best practice in relation to consumers who are struggling to pay bills and encourage Ofcom to have a close working relationship with debt charities.

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[http://stakeholders.ofcom.org.uk/binaries/research/statistics/2015dec/affordability\\_omnibus\\_2015.pdf](http://stakeholders.ofcom.org.uk/binaries/research/statistics/2015dec/affordability_omnibus_2015.pdf)  
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### ***Access services and equality***

We are glad to see the emphasis in *Securing Standards and improving quality* on the importance of monitoring the implementation and user experience of next generation text relay. We will continue to engage with Ofcom's work to inform potential users about next generation text relay, as well as its further development. As we mentioned last year, we are pleased that Ofcom provides the option of video relay for those stakeholders and consumers who wish to use it and encourage Ofcom to continue assisting groups working towards the wider provision of this important resource.

We strongly believe that, as far as practicable, all users should have equivalent access to content across platforms. We would urge Ofcom to maintain its focus in these areas. We welcome the forthcoming consultation on deciding whether to change the rules and guidance for live subtitling. There have been important technical developments in the provision of live subtitling and we are extremely keen to see these promoted and used as soon as possible for the benefit of people who currently experience detriment from the provision of delayed text.

We will continue to engage with Ofcom's range of work on the accessibility of content, including speaking Electronic Programme Guides, improving the accuracy of live subtitling and decreasing its latency, in addition to the provision of subtitles and Audio Description across a range of platforms including on video on demand content. We have welcomed Ofcom's initiative to secure accessibility in EPGs and look forward to early implementation of changes to the EPG Code. We will continue to engage with the broadcasters and platform providers in relation to video on demand subtitling levels.

ACOD will continue to advise Ofcom on the development of its Single Equality Scheme and particularly its disability action plan which set out how Ofcom ensures that it is a positive organisation for older and disabled employees and consumers. To ensure that the colleague base reflects the society it serves, we would encourage Ofcom to adopt diversity targets for the recruitment and development of both disabled and older people in addition to those in relation to gender and people from a BAME background.

We welcome that Ofcom's Plan includes reference to its duty to promote equality of opportunity for disabled people (which falls within ACOD's remit). The participation of older and disabled people in programmes, and their accurate portrayal are central pillars to maintaining audiences' confidence and engagement with broadcast content.

### ***Digital engagement***

We would continue to encourage a better balance in the Plan between enabling availability and supporting usage/engagement. Ofcom has an important role to play in the area of

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usage/engagement - not least through the provision of information and the facilitation of progress by stakeholders.

While the advantages of online connectivity apply to all groups in the community, they are especially relevant to disabled people, those on a low income and older people, many of whom may be less mobile than younger people. And yet we know that take-up of the digital world is unequal amongst the population. Ofcom's latest Adult Media Use and Attitudes Report<sup>7</sup> bears this out. Ofcom's recently published research on disabled consumers' access to, and use of, communication devices and services also found that not all disabled consumers with access to communication devices and services were making personal use of them. A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different disability types. This is a serious concern.

While Ofcom's remit may not include specific regulatory powers in this area, Ofcom does, we believe, have an important role to play in respect of encouragement and leadership. This would seem to be an example of where Ofcom's 'soft powers' and research can be used to good effect and we would like to see the issue of digital engagement fully recognised within the Plan.

### ***Privacy and security***

As more and more data is collected about people - both as they knowingly disclose information on platforms such as social media and as they unknowingly share digital details about themselves whilst conducting everyday business - two fundamental questions arise: a) what are the implications for our individual privacy; and, b) how can we control and manage the use of our personal data more effectively?

With the potential of the Internet of Things to collect and use increasing amounts and types of consumer information and as the market for personal data becomes ever more complex and monetised, it is increasingly important that people understand the implications of the consent they are giving organisations for the use of their data and, with regard to security, the precautions they can take. The Panel has commissioned new research to build on our earlier research ([Online Personal Data - the Consumer Perspective](#)<sup>8</sup>) which we will publish in 2016. We look forward to discussing the issues that need to be considered as policy making and regulation develop in this area.

<sup>7</sup> [http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/media-lit-10years/2015\\_Adults\\_media\\_use\\_and\\_attitudes\\_report.pdf](http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/media-lit-10years/2015_Adults_media_use_and_attitudes_report.pdf)

<sup>8</sup> <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>

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We are very conscious of the extent of the rapidly evolving privacy and security issues facing people in a highly connected world and would encourage close attention to these areas. To that end, we would suggest that the proposed Plan would benefit from further detail of Ofcom's intended work in relation to the Internet, including the Internet of Things, and that explicit mention is made of working with other organisations to support consumers and micro businesses.

### *The Business Consumer*

The Panel's remit includes representing the interests of micro businesses. Ninety five percent of private sector businesses in the UK can be classified as a micro business. Our 2014 report [Realising the potential: micro businesses' experiences of communications services](#)<sup>9</sup>, based on [independent, qualitative research](#)<sup>10</sup> found that communications services play a critical role in the success of micro businesses. However, they face a wide range of challenges in using and fully exploiting the opportunities offered by these services and technology for the benefit of their businesses; and, for the people running these enterprises, time is often at a premium. Following the research, we highlighted that for micro businesses to gain greater benefit from their communications services, action needs to be taken in three key areas - infrastructure, tailored communications service packages and the provision of information and advice.

We have welcomed Ofcom's subsequent focus in this area, including the ongoing development of its portal to provide advice for businesses. We would urge Ofcom to keep micro businesses at front of mind with larger SMEs when it comes to considering their specific needs and how they are served by the market. We look forward to continuing to work with Ofcom and stakeholders to explore how best the industry and regulators can deliver services that better meet the needs of these business consumers.

Finally, as you know, in 2015, we conducted a review of Ofcom's consultations process and formally submitted our recommendations. We have been pleased to see some of the approaches we recommended being used subsequently and look forward to their continued use - particularly around the promotion of consultations and the acceptance of consultation responses in alternative formats.

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<sup>9</sup> <http://www.communicationsconsumerpanel.org.uk/research-and-reports/realising-the-potential-micro-businesses--experiences-of-communications-services>

<sup>10</sup> <http://www.communicationsconsumerpanel.org.uk/downloads/micro-business-qualitative-research-written-report-final.pdf>

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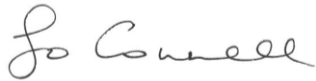
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In summary, we think the proposed Plan is a good one and we support it. As we have outlined, there are certain areas we would like to see strengthened or clarified further, and we hope our suggestions are useful.

We look forward to continuing to work with you.

Yours sincerely



**Jo Connell**  
Chair - Communications Consumer Panel and ACOD

## Communications Consumer Panel

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