Minutes of the 56th meeting of the Communications Consumer Panel

Wednesday 6 May 2009 at 9.00 hours

Ofcom, Riverside House, 2A Southwark Bridge Road, London, SE1 9HA

Present

<u>Consumer Panel</u>
Anna Bradley (Chair)
Fiona Ballantyne
Louisa Bolch
Kim Brook
Colin Browne
Roger Darlington
Maureen Edmondson
Damian Tambini
Bob Warner

<u>Apologies</u>
Leen Petré

<u>In attendance</u>
Alistair Bridge (Principal Adviser)
Richard Davies (Secondee from Baker Mackenzie)
David Edwards (Panel Secretary)
Claudio Pollack (Director of Consumer Policy, Ofcom - items 3, 4 and 6)
Dominic Ridley (Policy Adviser)
Other Ofcom colleagues (items 3, 4, 5, 6, 8 and 9)

1.   Declaration of members' interests

1.1   Colin Browne had been involved in setting up ICSTIS (now known as PayphonePlus). This was relevant to discussion under item 6 on premium rate services. Roger Darlington is a member of the Board of Consumer Focus. That body had a number of consumer Functions in relation to Post and Roger Darlington would withdraw from discussion of the first part of item 8 which would comprise a briefing on Post from Ofcom. He would then rejoin the meeting.

2.   Minutes of the meeting on 1 April 2009 and matters arising

2.1   Minutes of the previous meeting were agreed.

Mobile coverage
2.2   Alistair Bridge introduced Richard Davies. A trainee solicitor with the law firm Baker Mackenzie, he had been seconded to the Advisory Team for a six week period. He would prepare a discussion paper on mobile coverage issues, in consultation with Kim Brook, Roger Darlington and Bob Warner, for discussion at

the 9 June Panel meeting. This could result in a Panel 'call to action', ie highlighting the issue of coverage publicly and calling for action from mobile operators or policy makers. Issues for consideration could include 'not-spots', the quality of data on coverage, mobile masts and planning issues, network sharing and the growth of mobile broadband.

Panel website
2.3   Dominic Ridley had been exploring steps to make better use of and to promote the Panel website, including posting of video clips, search engine optimisation and use of the Panel logo as a link from the Ofcom site. Ofcom was planning a re-launch of its website and the Panel would benefit from shared learning. Another strand of work related to improving accessibility of the Panel website. In July the Panel would receive a data set on visits to the Panel website.

PhonepayPlus
2.4   At its April meeting the Panel had agreed to provide advice to PhonepayPlus (PPP) on its new Code. PPP planned to issue an initial paper in May setting out thoughts on the outcomes it wished the Code to achieve and expected to publish a consultation in the Autumn. It had agreed to provide the Panel with a quarterly data set of the issues it dealt with and a proposed format for the report had been received by the Advisory Team for comment.

Advertising Standards Authority
2.5   Louisa Bolch and Alistair Bridge had discussed the Advertising Standards Authority code review and consideration was being given to a possible Panel response. Discussion had also touched on whether the Panel should prompt a debate on regulation of online advertising, for consideration as part of the Panel's work stream on trust and security.

Quality of service
2.6   A written response to the Panel's advice note on quality of service (QoS) in telecoms had been received from Ofcom. It would be copied to members.

AP1   Richard Davies to provide Panel with a discussion paper on mobile coverage for discussion at the June meeting.
AP2   Dominic Ridley to confirm that the Panel had individuals' permission to post video material related to Panel research on the future of broadband.
AP3   Secretary to email Ofcom response on QoS to Panel members

3.   **Access & Inclusion research**

3.1   The Panel had been provided with slides on initial findings of research on internet take-up conducted as part of Ofcom's Access & Inclusion (A&I) project. Claudio Pollack and other Ofcom colleagues joined the meeting for discussion. The research had been undertaken by Ipsos Mori based on qualitative and quantitative research, the latter comprising 1800 participants. All were people without the internet at home. Findings were expected to be published at the end of May and would feed into the Digital Britain agenda and Ofcom's A&I

statement, due for publication during the Summer. There was lengthy discussion, including the following points.

- It was noted that digital inclusion had moved up Ofcom's agenda, was part of the Digital Britain agenda and that the Government was about to announce the appointment of a digital inclusion champion. 'Joined-up' thinking would be required to move digital inclusion forward.
- Panel research had suggested that the internet was becoming essential; the Panel's research had included respondents with internet access.
- It was suggested that interviewer bias could have affected responses in the Ofcom research, with participants reluctant or embarrassed to give their real reasons for not using the internet or for not having home access, eg due to low income or an unwillingness to admit to not being able to use the internet. This could result in overestimation of the self-excluded.
- Ofcom had employed a range of methodologies to avoid interviewer bias and to address hard or sensitive issues but when respondents said they were not interested it was sometimes difficult to get beyond that.
- It was further suggested that there could be distortions due to the presentation of Ofcom's draft findings which focused on the main reasons for not having the internet at home, as many people could be excluded from the internet for a combination of reasons. Ofcom was in the process of examining the overlaps, eg two out of three of the self-excluded had also mentioned financial reasons for not having the internet at home and these would be reported on in the published report.
- The research found that some people overestimated the cost of getting the internet or a computer. Fear could be a barrier to take up for some and it was not easy to determine this from research. It was important not to be dismissive about people who claimed not to be interested in the internet, such people remained to be convinced that the internet could make a difference to their lives.
- On cost, an Ofcom colleague said that some respondents had overestimated this but not by a wide margin. Respondents who said that they did not want the internet were more likely to have no experience of it or have proxy access through their children, another family member or a friend. A third of respondents showed little interest in any of the policy ideas suggested, eg pre-pay internet or a half-price computer.
- It was suggested that a social marketing campaign was required; that experience of the internet could transform some people's views; and that if they were given a short, free and supported trial service they would be likely to want to retain internet service. Of particular concern was the 40 - 55 year group, in the future they would comprise the older population as public services come to be delivered increasingly online. A knowledge gap would need to be filled and barriers overcome to change attitudes.
- Lessons could be learned from the digital switchover help scheme although providing people with the necessary kit did not mean that they would automatically use it.
- It was suggested that Ofcom's policy ideas did not address the one third of

respondents who were not interested in the internet, ie the self-excluded. Changes in behaviour would be necessary and additional policy proposals would be required. There were reasons for a lack of interest shown by some consumers and citizens. Many were on low incomes or were older people. Both groups were heavy users of public services and these were not well provided over the internet. Increasingly the internet was about interactivity but this feature was not being utilised to deliver the kind of public services that people would want to use. Where there were Government initiatives they appeared to be focussed on issues that were easier to resolve.

- Concerns about privacy and security had been identified in the Panel's research among the general public. It was suggested that by addressing these concerns one barrier to internet take-up could be addressed. Respondents in the Panel's research had felt that privacy and security concerns would increase in the future. Ofcom had not found privacy and security to be major concerns in its research, it was not perceived as a significant barrier to take-up but as a concern for people who were already online.

- An unknown in the provision of online public services was the element of social interaction that would be involved, something that had benefits for social and mental health. Visits to the doctor, for example, had a social dimension. Webcams could be part of the online experience to maintain those interactions.

- There were a number of positive issues related to older people's activity online. These included the citizenship issue of enhanced access to political processes, eg via online campaigns, and ease of communication by email to friends and family. But some people required support when purchasing a computer and with set-up.

- In response to a query related to internet provision on a fixed pre-pay basis as a viable policy option, an Ofcom colleague explained that the economics of internet usage and an internet connection were different, with low costs for providers when their customers surfed the internet but more significant costs in providing the line to do so. The emergence of mobile broadband could provide new pre-pay opportunities

3.2   The Chair drew discussion to a close. She said that there were relationships between Ofcom and Panel research that could be explored further and a joint workshop could be a way forward. The Panel had expressed some reservations about the focus of policy options generally but acknowledged that the ideas put forward by Ofcom could be effective in assisting more people to get online. The Panel wished to see these ideas explored further and was particularly interested in the self-excluded. It wished to see thorough treatment of this group in Ofcom's planned research publication. For this group it was not a simple matter of persuading them to go online by explaining the value and benefits or providing skills training and support. For many it was much more a case of ensuring that there was quality content that was both appealing and met people's needs. There was learning that could be applied from the digital switchover process.

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AP4   Advisory Team to consider with Ofcom a joint stakeholder event on Ofcom internet take-up research and the Panel's future of broadband research.

4.   Access & Inclusion consultation

4.1   Members had received a discussion paper from Ofcom and a copy of the executive summary of Ofcom's consultation document. From an Access & Inclusion (A&I) perspective, Ofcom's five priority areas were broadband availability and take-up; 999 roaming; services for people with a disability; a review of the existing universal service obligation in telecommunications; and media literacy. Claudio Pollack and another Ofcom colleague were present for discussion that included the following points.

- Gaps in mobile coverage represented an important issue for the Panel and concern was expressed that it was not included in the A&I priorities.
- Claudio Pollack said that although mobile coverage was not one of the five A&I priorities Ofcom's Mobile Sector Assessment (MSA) team was taking forward work on coverage. An issue in determining priorities was whether access to a set of fixed services via fixed broadband was more important for citizens and consumers than having mobile access on the move. Ofcom had taken the view that it was the former. If the Panel felt that mobile coverage should be made an A&I priority Ofcom would need to consider this.
- The Panel recognised that there were a number of important issues to pursue related to services for people with a disability, including TV access services with non-linear programming. Ofcom was poised to undertake a review of the Television Access Code. A Panel member said that Ofcom should encourage debates to make access services more ambitious.
- Another area that needed to be addressed was the interface between buying kit and the ability to set it up and use the internet. One option could be to persuade retailers to provide support or to sell a support service. Alternatives could be support from the voluntary sector or an information hotline. It was suggested that this could be an issue for the Government's new digital inclusion champion and task force. Mention was made of initiatives by a number of local authorities.
- Easily usable equipment was also important but there was a difficulty. Ofcom's remit was limited to encouraging availability. Claudio Pollack said that Ofcom did not have powers to oblige retailers to provide a support or set up service and suggested that this was something that could require a public initiative or could arise as a result of competitive offerings. A model could be the Channel Five re-tuning exercise with home visits.
- The report of the Digital Britain Media Literacy Working Group had not highlighted support issues related to purchasing and set-up. Improved media literacy and compelling content would lead to more people online.

4.2   The Panel continued its discussion of A&I without Ofcom colleagues present and this included the following points.

- Where Ofcom's powers were limited it could conduct research and provide an evidence base for use by other bodies or organisations. Other bodies could be engaged in relevant communications research and Ofcom could be encouraged to engage with other research evidence and bodies.
- A sound methodology was required to determine the full extent of mobile coverage. Ofcom had not been able to say that coverage was of equal standing with its five A&I priorities. This raised the questions of how important it was for Ofcom to address coverage, of whether it should be a sixth priority or whether it should displace one of Ofcom's five priorities.
- It was suggested that it could be linked or combined with Ofcom's work on 999 mobile roaming.
- Access to fixed broadband was important but the Panel's research suggested that mobile services would increase in importance in the future. There were related wireless issues, including 2G liberalisation and some related to WiMax. These needed to be brought together in a coherent way.
- Although the issue of coverage was being considered as part of the MSA Ofcom did not appear to regard it of major importance, partly it was not aware of the size of the problem. If the Panel felt that it should be a priority issue for Ofcom it would have to make that argument, otherwise there would not be speedy resolution to coverage problems.
- Mobile coverage could be addressed in two ways: by considering the coverage obligations on mobile operators and available coverage data or by asking questions about the impact gaps in coverage had on consumers. The first approach could involve a very time consuming data gathering exercise and what Ofcom had proposed appeared limited in scope. Coverage issues went beyond 2G mobile services, they included 3G coverage and availability of broadband.
- Reference was made to the digital inclusion taskforce. There would be a need for coordinated actions across UK Government departments and in the devolved Nations, including implementation of outcomes from the Digital Britain final report. A 'digital minister' could be part of the answer.

4.3   Agreed Panel position: Ofcom should address gaps in mobile coverage as one of its priorities. The Panel agreed that it would submit a response to the A&I consultation and that in particular it would raise its concerns about the importance of resolving mobile coverage issues and improving services for consumers with a disability.

AP5   Chair and advisory team to consider whether it would be appropriate to make a public response to the Media Literacy working group's report.
AP6   Advisory Team to provide a one page chart showing how the different parts of Government fit together in their work on digital communications.
AP7   Advisory Team to discuss with Ofcom its involvement with ESRC research projects and consider whether there is a role for the Panel.
AP8   Advisory Team to draft a response to Ofcom's A&I consultation.

5.   Enforcement report

5.1   Members had received a short discussion paper from Ofcom and a draft copy of Ofcom's Enforcement report. The report covered Ofcom's enforcement powers, recent activity and priorities going forward. Ofcom colleagues joined the meeting for discussion that included the following points made by members.

- Ofcom's Advisory Team (OAT) acted as the main contact for citizens and consumers wishing to make a complaint about an issue in the communications market. It was suggested that there could be over-reliance on data from the OAT; that the people who raised complaints were likely to be proactive and self-selecting; and that Ofcom should look to wider sources of information on complaint issues.
- Ofcom colleagues said that OAT data was one source but that issues were identified by Ofcom's Consumer Policy team and by external stakeholders/organizations also. For example, in June 2008 the National Consumer Council (since replaced by Consumer Focus) had submitted a super-complaint about the cost of calls made by prisoners.
- It would be important to monitor behaviour in the marketplace once an investigation or enforcement action had been completed. Ofcom ensured that there was compliance with its enforcement decisions and where enforcement action was not involved there were monitoring activities.
- Details of Ofcom enforcement activities and of the firms involved represented an information source of value to consumers and citizens, raising the question of whether Ofcom was doing as much as it could to share information. A related information issue was the need for early warning for consumers since enforcement action could take time and consumer harm continue. Stories in the press could also be helpful. It was suggested that Ofcom could be more transparent and innovative in the provision of enforcement information. An Ofcom colleague said that Ofcom's enforcement workstream was exploring the ways it communicated its activities, which currently included a number of regular online bulletins.
- 'Horizon scanning' was necessary to foresee or to prevent scams and consumers had to be well informed about who to contact when problems arose. Companies that were members of the Alternative Dispute Resolution schemes in telecoms were required to inform their customers that they were members of those schemes. It was reported that Ofcom engaged in 'scanning' work through its work with the Office of Fair Trading and with local Trading Standards departments but it was often difficult to predict scams. Its enforcement workstream was looking at other ways to detect emerging issues.
- It was suggested that Ofcom should look beyond complaints data, since it was only a part of a much bigger information picture, and a broader definition of stakeholders was required. Such a definition could include price comparison websites that could also be persuaded to publicise enforcement issues.
- The Panel recognized that consumer enforcement work had become an

increasing priority and that it was important for Ofcom to devote sufficient resources to this work.

- It was noted that Ofcom had developed a set of operational priorities as a guide to the appropriate level of urgency it should give to investigating cases involving illegal broadcasting and these priorities were related to the degree of harm caused. Concern was expressed that enforcement action could have a differential effect on different communities, that there could be issues related to discrimination where illegal broadcasting served certain communities. This raised the question of Ofcom's and the Panel's duties in relation to consumers of illegal broadcasting. An Ofcom colleague said that the priority was spectrum management and its protection from harm. Enforcing legal use of spectrum was often initiated as a result of a complaint, when Ofcom was duty bound to act. It was never the result of decisions based on demographics.

5.2   The Chairman drew discussion to a close and confirmed that the draft enforcement report contained a number of issues that would be of ongoing interest to the Panel [the Enforcement report was published on 12 May 2009].

AP9   Advisory Team to consider when/how the Panel should engage further with Ofcom on enforcement issues.

6.   Premium rate scope review

6.1   Panel members had received a discussion paper on Ofcom's premium rate services (PRS) scope review. The consultation would consist of four sections: a market development section, including Ofcom's rationale for the review; an analytical framework setting out a policy perspective; application of the framework to a number of new and existing PRS; and a number of proposals to improve the current regulatory framework. Members had also received a supporting background paper on PRS; the terms of reference for the scope review; the relationship between PhonepayPlus and Ofcom; a summary of the three sections of the planned consultation document; and details of the legal definition of PRS. Claudio Pollack and another Ofcom colleague were present for discussion that included the following points.

- Mobile operators appeared resistant to further regulation and this raised the question of what they proposed as a solution in the context of both an increase in mobile services and mobile related PRS complaints. Mobile operators appeared to argue that the problem lay with third party PRS content providers. There were a number of disputed services including Payforit and On-portal services, both of which mobile operators argued were not PRS as defined by the Communications Act 2003.
- It was queried whether it was necessary for Ofcom to invest resources in a scope review. Claudio Pollack said that a review had already been deferred on other occasions due to more pressing consumer policy work but there were areas of both regulatory uncertainty and of potential consumer harm to be addressed.

- It was suggested that the scope review could provide an opportunity to assess criteria for delegation of powers to self-regulatory bodies. Claudio Pollack confirmed that PhonepayPlus was a regulator and an agency of Ofcom but the consultation would raise the issues of light-touch regulation and incentives for self-regulation. Outcomes would need to ensure that PRS regulation was proportionate.

6.2   The Chairman drew discussion to a close. It was agreed that the Panel would consider how it would contribute to Ofcom's PRS scope review, particularly in the context of opposition to increased PRS regulation from mobile operators [Ofcom published is PRS scope review on 15 May 2009].

AP10 Advisory Team to keep a watching brief on Ofcom's work on PRS and the legal process and consider whether to respond to Ofcom's consultation.

7.   Panel Annual Report and Work plan

7.1   Members were provided with a paper on the proposed structure and content of the Panel's Annual Report for 2008/9 and Alistair Bridge summarised this. Members had also received the draft work plan for approval. There was discussion that included the following.

- Suggestions were made about the content of the Annual Report, eg reporting on the Panel's relationship with Consumer Focus; changes in the Panel's Advisory Team arrangements; and inclusion of details of the Panel's budget and spend.
- Consideration was given to the format of the Annual Report, ie in hard or soft copy only on the Panel's website, to how it could be used to raise awareness of the Panel and to the mechanism for approval of the final draft for publication.
- There were positive comments on the draft work plan, and suggestions on how to improve the graphics in the document showing the Panel's work areas and priorities and specific interest groups.

7.2   The Panel agreed that following minor amendment the work plan would be published on the Panel website. It was also agreed that the Panel would publish a bound hard copy document comprising the Annual Report and details of the work plan. The Chair informed members that Ofcom's Annual Report would include a summary entry on the Panel.

AP11 Advisory Team to publish work plan on Panel website after making minor amendments to the draft.
AP12 Alistair Bridge and Siân Evans to draft a combined Panel Annual Report/work plan document for publication in hard format, simultaneously publishing additional Annual Report detail online. Process to include checking statutory requirements related to the Annual Report; consultation with the Chair, Colin Browne and Fiona Ballantyne to confirm document coverage; and Panel members to have the opportunity to comment on the draft before publication.

8. Post

8.1 Roger Darlington withdrew for the first part of this item which was an update from an Ofcom colleague on the progress of the Postal Services Bill. The update included details on what the legislation was designed to achieve; its timetable; key issues in the Bill related to the regulation of Post; amendments that had been tabled; what was expected to happen when new powers were vested in Ofcom and an advisory role given to the Panel, including plans for a market review of postal services supported by research; and the implications of recent news reports about opposition from some backbench MPs to the proposed part-privatisation of Royal Mail. There was brief discussion of universal service and requirements on Royal Mail to make deliveries. The Panel requested that it be kept informed of the progress of the Bill.

8.2 Roger Darlington rejoined the meeting for discussion of how the Panel would prepare itself to take on an advisory role in relation to Post. A day of presentations and discussion had been organised for the Ofcom Board and Richard Hooper, chairman of the panel that undertook the recent review of the postal services sector, had been a contributor. Consumer Focus would continue to have consumer functions and it would be important for the Panel to have a dialogue with that body.

8.3 It was agreed that a Post training day would be useful for the Panel, probably in July 2009, and that the Panel's post sub-group would give consideration to this and to related matters including the resources the Panel would need and the stakeholders it should meet.

AP13 Alistair Bridge to ensure Panel members receive regular updates on the progress of the Postal Services Bill.
AP14 Advisory Team to set up a conference call for the Post sub-group in advance of the next Panel meeting.
AP15 Panel Post sub-group to report to June Panel meeting on Panel preparations for Post.

9. BT's Next Generation Network migration

9.1 Members had received an information paper from Ofcom on the progress of BT's roll-out of its 21st Century Network (21CN), an internet protocol based upgrade of its telephony network and a major cost saving exercise. Ofcom colleagues joined the meeting for discussion. There was discussion that included the following points.

- Ofcom had a facilitating role and roll-out of 21CN was based on a number of commercial decisions by BT. If BT was able to reduce its costs there could be benefits for consumers.
- The Panel noted that BT's pilot and lab testing had revealed that a significant number of alarm systems were not compatible with 21CN, they

would need to be replaced or adjusted. These systems included social/telecare alarms, fire and security alarms. Ofcom confirmed that BT had been careful to identify all affected customers but there would be costs in resolving alarm issues, a large proportion of which would fall on the public sector or on households. Concern had been mitigated by BT's review of its overall 21CN strategy and its decision not to pursue a mass migration of all lines. It would be important to ensure that non-compatible alarms were not being sold or installed.

- There had been a number of delays and some unforeseen problems associated with 21CN. It was suggested that next generation access could turn out to be a better enabler of new services.

9.2 It was agreed that the Panel would be kept informed by Ofcom about 21CN developments. The Panel noted that BT appeared to have processes in place to deal with the alarms issue. 21CN would be discussed at a coming meeting between the Chair, Roger Darlington and Bob Warner with BT and members were invited to suggest other items for discussion with BT.

AP16 Ofcom to keep Panel informed of any 21CN related alarm issues and Advisory Team to enquire whether non-21CN compatible alarms are still being sold/installed.
AP17 Panel members to provide any further suggestions for discussion topics for the Panel's catch-up meeting with BT on 26 May.

10.   Digital Britain

10.1 Alistair Bridge presented a set of slides to allow the Panel to take stock of the Digital Britain review. The slides covered recent activity including the Digital Britain summit which had been attended by the Panel Chair, meetings in the Nations attended by Fiona Ballantyne and Maureen Edmondson, the Budget commitment on universal service and public utterances about 'industrial activism'; detail on the Budget commitment; Government plans to encourage investment in networks and content and in media literacy; needs and initiatives post-Digital Britain; and events coming up that included a Panel research presentation to the Digital Britain Steering Group; announcement of a Digital Inclusion Champion and Taskforce; and publication of the Digital Britain Final Report, which was expected to be followed by a Digital Economy Bill. There was brief discussion that included the following points.

- At the Digital Britain meeting held in Northern Ireland it had been suggested that there could be a phased 'switch-off' of some Government services to incentives their use online. There had been discussion of how to engage young people in e-democracy and the democratic process.
- Digital Britain could result in changes to Ofcom's remit and the Panel would need to consider the implications of this.
- It was reported that in discussion with the Ofcom Content Board it had been agreed that there would be joint working by sub-groups from both the Content Board and the Panel on media literacy.

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- All the outcomes beyond the Digital Britain final report were not clear, eg those related to spectrum or to public service broadcasting.
- The Panel's presentation to the Digital Britain Steering Group could include a slide on the implied direction of travel of Digital Britain, including any unforeseen consequences.
- It was likely that a number of outcomes would be affected by political considerations, depending of the result the next election.

10.2   The Chair drew discussion of this item to a close and Colin Browne agreed to arrange a meeting with Greg Dyke, who was leading a review of the UK's creative sector for the Conservative Party.

AP18 Secretary to arrange a date for a joint Panel/Content Board session on media literacy.
AP19 Colin Browne to contact Greg Dyke about a meeting with the Panel.

11.   Forward plan

11.1   Members were provided with a document with details of future monthly Panel meeting agendas and other planned Panel activities, organised in terms of the Panel's work priorities. The document would be kept up-to-date and copied to members with monthly Panel meeting papers. In the past the Panel had held some monthly meetings in the Nations. Rather than continue that practice the Chair said that the Panel should give wider consideration to its engagement in and with the Nations and Panel members were invited to make suggestions. The Chair had committed to annual meetings with Ofcom's Advisory committees for England and the Nations. The next Panel meeting would include an item to review how well the Panel was working together. A new member of the Panel Advisory Team would begin work on 15 June.

AP20 Panel members to provide suggestions on Panel engagement in the Nations and regions.
AP21 Secretary to circulate 2010 Panel meeting dates.

12.   Any other business

12.1   Fiona Ballantyne had emailed Alistair Bridge on concerns about scams involving mobile phone insurance. Fraudsters were targeting people with a new mobile service and making them believe they were getting a call from a shop or a mobile phone network. But after giving their payment details consumers were ending up with poor quality phone insurance or none at all. Alistair Bridge would follow up those concerns.

AP22 Alistair Bridge to follow-up mobile insurance scam raised by Fiona Ballantyne.

……………………………….Chairman
……………………………Date