COMMUNICATIONS CONSUMER PANEL

13 July 2009

Claudio Pollack
Director of Consumer Affairs
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

Dear Claudio,

Response to Ofcom's consultation on access and inclusion

The Communications Consumer Panel welcomes Ofcom's intention to bring together all the issues that have a bearing on access and inclusion under a single overarching project and treat them in a consistent and co-ordinated way.

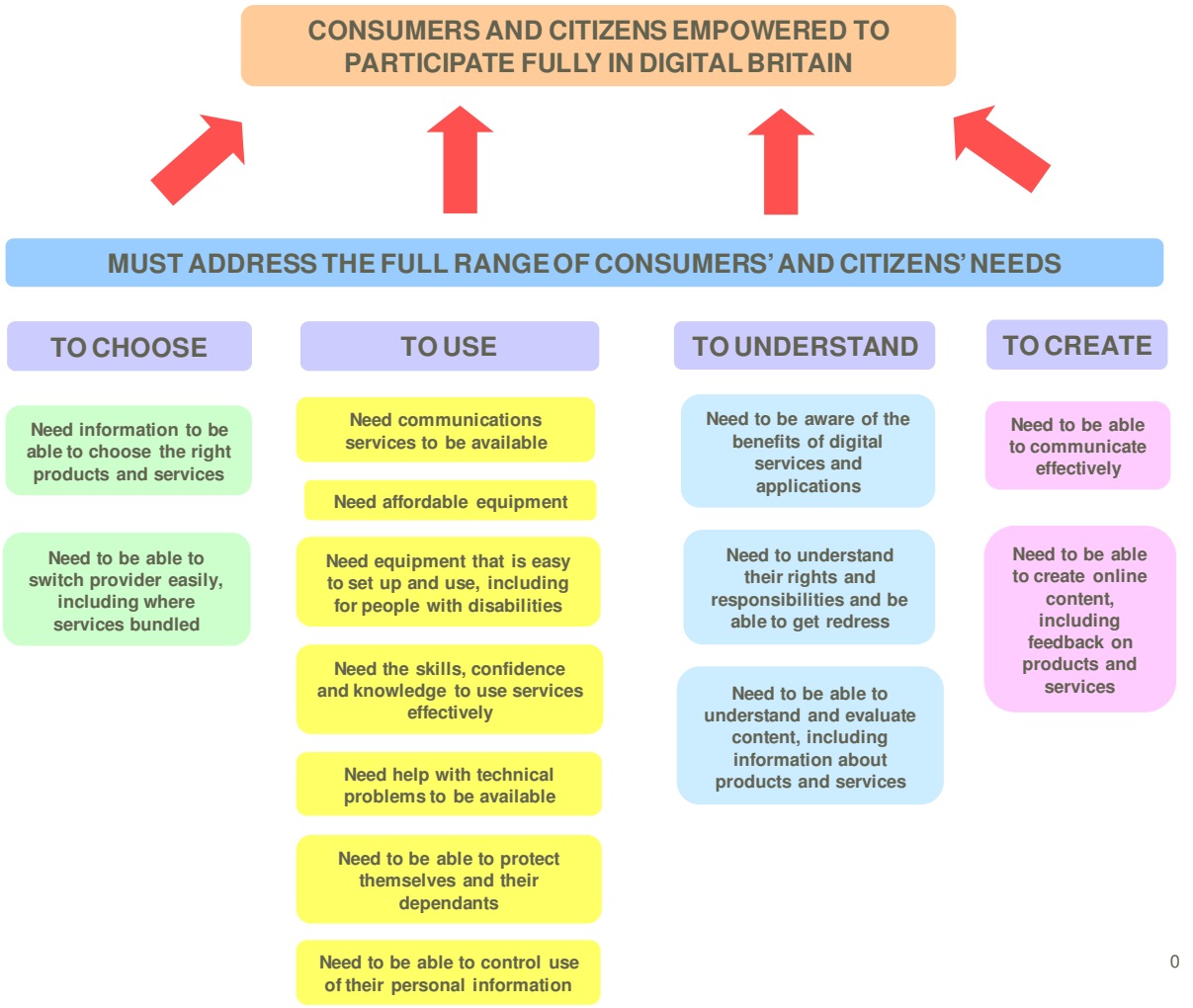
Following the Panel's engagement with the access and inclusion project at its meetings in February and May this year, I thought that it would be helpful to summarise the main points which the Panel has made.

Consider the full spectrum of consumer and citizen needs

As a general point, the Panel would like to encourage Ofcom to view issues from the perspective of consumers and citizens, and design policy initiatives that take account of the full range of their needs. The diagram on the following page, which we included in a letter to Lord Carter as a contribution to the Government's thinking about Digital Britain is an initial attempt to map out these needs.[1] We will be developing this framework over the coming months and we hope that it will be useful in assessing whether people's needs are being met and identifying gaps in delivery.

The Panel will also be seeking to understand the journeys that consumers make in order to participate digitally, focusing in particular on the groups of consumers that most need help, namely people on low incomes, older people and people with disabilities.

[1] The letter has been published on the Panel's website: http://www.communicationsconsumerpanel.org.uk/Letter%20to%20Lord%20Carter.pdf



Given the need to think about consumers' and citizens' needs in the round, the Panel supports the Government's broad focus on promoting digital participation, which is defined in the Digital Britain final report as:

> "Increasing the reach, breadth and depth of digital technology use across all sections of society, to maximise digital participation and the economic and social benefits it can bring."

We think it would be helpful for Ofcom to be clear about how all of its access and inclusion projects contribute to this goal and to explain how they will be co-ordinated on a day-to-day basis.

Extend availability

The Panel's recent research report *Not online, not included: consumers say broadband essential for all* showed that it will soon be essential for everyone to have broadband at home. This highlights the importance of making broadband available throughout the UK and so the Panel welcomes the Government's universal broadband commitment. It will be now be necessary to ensure that the commitment is implemented effectively and Ofcom will play an important part in this process. In the Panel's view, the key test of success will be whether in practice people everywhere in the UK will be able to use the online services and carry out the activities that they value in a reliable and consistent way. It will also be important to make sure that the commitment to deliver a 2Mb/s universal service does not become outmoded.

We appreciate that the Government's plan to stimulate the rollout of next-generation super-fast broadband should hopefully mean that this does not happen. But a contingency plan is needed and the universal 2 Mb/s service should be procured in a way that enables the level of service to be increased easily and efficiently should this prove necessary.

The Panel is also concerned about mobile coverage. The Panel's research report *No one should miss out: consumers say what they want from the digital future* showed that being able to communicate on the move will be increasingly important, for both social and work reasons. In the Panel's view, the current level of mobile coverage is inadequate. In particular, there is an unacceptable gap between official data, according to which 2G coverage is near universal, and the reality experienced by consumers, which is that there are a great many not-spots and areas where the quality of coverage is poor.

The Panel would like Ofcom to give the issue of mobile coverage greater priority and have made this point in the context of Ofcom's Mobile Sector Assessment (MSA), which is currently looking at the issue. We will be responding to the second MSA consultation and will feed in the results of the research that we will be carrying out to better understand consumers' experiences of mobile coverage.

The Panel welcomes the work that Ofcom has done to prompt industry to introduce emergency mobile roaming. The Panel will continue to monitor progress with implementation and is keen for it to be available throughout the UK as soon as possible and in any case by the target date of the end of this year.

The Panel will also continue to engage with the different elements of Ofcom's review of universal service and will be responding to the consultation scheduled for the autumn.

Promote digital participation

Making services available is only part of the challenge of enabling everyone in the UK to use digital devices and services to participate fully in the social, economic and political spheres of society. We agree with Ofcom that there needs to be a stronger focus on promoting digital participation, which we think is a much better term than media literacy in that it gives room to focus on the full range of consumers' and citizens' needs that we outlined above.

We also welcome Ofcom's recent research on what stands in the way of people getting online and how Government and industry can assist. Continuing to produce such high-quality research is one important way in which Ofcom can help to promote digital participation.

As a member of the Media Literacy Working Group that proposed to the Government the idea of a consortium to promote digital participation, the Panel welcomes the Government's decision to adopt this idea and support it with funding for the next three years. We support the consortium's planned social marketing programme and it will be important for it to be linked to the delivery of services at community-level that are tailored to the needs of those groups of people that need most help. It will also be important to challenge Government and industry to deliver more attractive content, particularly better online public services that could encourage people to try out the internet.

We look forward to contributing to discussions about: the priorities that the consortium should adopt; how its success will be measured; and how its activities will be overseen by Government and co-ordinated with those of others involved in promoting digital participation, including the Digital Inclusion Champion and Taskforce.

Ofcom will play a central role in promoting digital participation as the driving force behind the consortium, but Ofcom also has important and more specific roles to play in other areas. In particular, the Panel believes the consumer empowerment should be viewed as a key element of promoting digital participation. For example, consumers need to be able to:

- choose the equipment and services that meet their needs;
- understand their rights and responsibilities; and
- be able to seek redress when something goes wrong.

Underpinning all Ofcom's efforts to assist in consumer empowerment should be an understanding of people's needs and how they make decisions, of the part that information and other tools, such as advice or guidance, can play. The Panel welcomes, therefore, Ofcom's intention to develop a consumer empowerment strategy. This work should be seen as part of the wider efforts to increase digital participation, not least because the different aspects of digital participation require similar skills. For example, to choose between different providers, consumers need similar skills to those required to critically evaluate content.

The Panel also believes that Ofcom should focus on promoting the availability of easy-to-use and accessible equipment and services, particularly (but not only) for people with disabilities; increasing longevity means that many more people are having problems using equipment. We recognise that Ofcom has limited powers in this area and that they relate largely to the provision of text-relay services and TV access services. We recognise too that Ofcom has commissioned a report on the feasibility of introducing video-relay and caption telephony services and look forward to discussing the findings at a future Panel meeting. We also look forward to engaging with Ofcom's forthcoming consultation on TV access services and are keen to see such services extended to online content. However, we think it would be a mistake for Ofcom to focus just on the issues where it has the power to take action. People with disabilities, and the general population, have a wide variety of needs and there is not a one-size-fits-all solution. Ofcom can play an important role in providing the evidence base for others to act, building on the research published recently by its Advisory Committee for Older and Disabled People. But it may also be necessary for Ofcom to explain to Government how increased powers in this area would enable it to better meet people's needs.

The Panel suggests that Ofcom's leadership of the consortium to promote digital participation provides an excellent opportunity to encourage action by Government, industry and the Third Sector to create a step-change in the provision of much more easy-to-use equipment. In finalising the membership of the consortium, however, Ofcom should consider whether it would be helpful to add some equipment suppliers.

The Panel hopes that this letter will help Ofcom to develop its thinking about how to address the wide range of issues that affect people's ability to participate in society using digital devices and services. It will be hugely important for Ofcom to join up all of its initiatives in this area and ensure that they are ground in an understanding of people's attitudes and the full range of their needs. The Panel looks forward to continuing to advise Ofcom on this vital set of issues.

Yours sincerely,

Anna Bradley
Chair