Communications Consumer Panel and ACOD response to the CMS Committee Inquiry: Establishing World Class Connectivity Throughout the UK

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) greatly welcome this opportunity to respond to the Culture, Media and Sport Committee inquiry into the coverage, delivery and performance of superfast broadband in the UK, and into progress being made in extending and improving mobile coverage and services.

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

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers. Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Introduction

The Panel's driving force continues to be our belief that, given the increasingly central role of digital communications services in people's lives, society and the economy, it is vital to support fully the communications needs of all consumers, citizens and micro businesses. The ambition for "world class" connectivity is therefore to be welcomed and supported, and should be backed up by policy decisions that enable the ambition to be realised in a way that is sustainable and can evolve with changing consumer needs.

Consumers, citizens and micro businesses are more reliant than ever on communications services – mobile devices particularly have experienced an exponential rise in use. In the Panel's view, any sub-optimal delivery of communications services has ceased to be a cause of irritation for individual consumers and micro businesses - it is now an issue of real

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and significant detriment. The causes of such detriment may be (but are not limited to) a result of:

➢ inadequate infrastructure – be it a lack of reliable, fast broadband or the absence of robust and ubiquitous mobile voice and/or data coverage;
➢ poor customer service, including delays in service provision or repair; or
➢ a failure to treat consumers fairly.

Work must continue to ensure that the full range of communications services is made available and accessible to the whole population, together with high standards of coverage, speed and reliability, backed by excellent customer service and, for when things do go wrong, effective complaint handling systems.

Given the quick pace of technological change and the dynamics of the market, it is our view that consumers' and micro businesses' interests need promoting and protecting more than ever. It is vital that the needs of all consumers are considered in policy making, regardless of their level of engagement with the market. This is particularly crucial in the case of consumers who are potentially more vulnerable to detriment. We believe that the cornerstone of a successful telecommunications market will be a combination of availability, accessibility, reliability, innovation and trust. Such a market should innovate, improve service standards, offer uncomplicated choice and give good value for consumers. However, market failures do happen, and are often entirely predictable – for example, mobile coverage is not optimal, and too many people are unable to enjoy a reliable broadband service at a decent speed.

The communications sector is a particularly fast moving market. The 2003 Communications Act does not even mention the Internet. Yet being able to go online is now fundamental for many people and will become more so as we move closer to a "digital by default" society. In 2013, Ofcom research[1] highlighted that 94% of businesses said that their business would either 'struggle to function' or could 'only manage for a limited period' without the Internet. A similar level of dependence was found amongst residential consumers, with 64% saying that they would 'struggle to function'/ 'could manage but for a limited period' without their internet connection. And the last two years have witnessed a host of significant developments in people's online usage.

We are pleased that Ofcom's recent discussion document on its Digital Communications Review (DCR) acknowledges that: "even with effective and sustainable competition…some aspects of mobile service availability and quality are not meeting users' expectations". We are pleased also that it acknowledged, inter alia, the challenge of delivering widespread

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[1] http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/telecoms-market-data/fault-repair-research.pdf

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availability of services is recognised – although we would prefer a firmer term than widespread. A truly ambitious strategy might aim for universal (or near universal) availability. That, we believe, would send a stronger signal of intent to consumers and industry.

Communications must serve citizens as well as consumers. Digital participation is a key component of modern society. Whilst we should respect the choice of some not to engage with digital services, the lack of participation amongst some groups – because of poor access, affordability, a lack of skills, confidence or motivation - impacts not only on them directly but also on the overall strength of the economy, thus impacting on the broader population.

Earlier this year, the Panel/ACOD warmly welcomed the publication of the results of Ofcom's large scale quantitative research on disabled consumers' access to and use of communication services[2], carried out as part of the British Population Survey's (BPS) Household Survey. This built on research carried out by BPS for Ofcom in 2012[3] and was extended to include consumers with learning disabilities. The results show that, although progress has been made since 2012, access to communication services such as the Internet and mobile phones is generally lower for consumers with a disability than for those without, even when demographic factors have been taken into account. 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 types of impairment. These issues are of particular concern as distance learning, working from home and self employment are important possibilities for some disabled people.

Telecommunications is now rightly regarded as the fourth utility. But in direct contrast to many utilities, there are multiple suppliers who interact with consumers – both residential and business. For consumers to be truly empowered there has to be an integrated approach to telecommunications policy – a holistic understanding of consumers' needs underpinning pragmatic solutions at every level – ranging from the regulatory approach to providers' direct support of people's increasingly complex requirements.

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[2] http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/
[3] http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/disabled/Disabled_consumers_report.pdf

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Changing Nature of the Telecoms Sector

Consumers' use of fixed Internet and mobile voice/data has changed significantly since the 2013 research referred to above and these services are now essential components of many people's everyday lives. Ofcom's 2015 Communications Market Report noted that 'technology has changed the way we communicate, and for the most part is making life easier. Seven in ten (69%) internet users agree that '*technology has changed the way I communicate*' and six in ten (59%) agree that '*new communication methods have made my life easier*'. Digital communications are seen to bring benefits. Almost two-thirds (64%) of online adults agree that being online is '*invaluable for keeping me informed about current issues*', and six in ten (60%) agree that it helps them keep in touch with close family and friends. Just over half (52%) agree that it '*inspires me to try new things*'.'

Connectivity is required that is always on, secure, high quality, seamless and ubiquitous. This is needed to support consumers' and businesses' needs now – and, if it is not already, will be an essential requirement in the near future. This covers areas such as financial dealings, electronic payments for goods and services, access to digital services, health services, Government services and so on. And on the not too distant horizon, machine to machine communications, the Internet of Things and increasingly connected cities will mean that communications become ever more important.

Indeed, Telehealth and homeworking are both good examples of how communications can support wider societal change and provide access to services in areas that have experienced a withdrawal of physical resources. The Royal College of Nursing has stated[4] that "Remote monitoring…offers the potential to help the NHS deliver a range of clinical services more efficiently and effectively, and manage increasing demands on services. Several studies have shown that it reduces travel time for both patients and health professionals. It reduces waiting times and hospital admissions, patients can receive a quicker diagnosis, and the patient experience is extremely positive (NHS North Yorkshire and York, 2011; Darkins et al, 2008)… for some patients, remote monitoring provides a service that might not have otherwise been available (Scottish Government, 2009; DH, 2011)." Between 2007 and 2012 the number of UK employees who usually work from home increased by 13%. This was an increase of almost half a million people, taking the total to over 4 million employees out of a UK workforce of 30 million[5]. In the near future, people will expect to have the ability to move seamlessly from network to network and from device to device, and the line between personal and business use of communications will become ever more blurred. Connectivity on demand will become an everyday expectation.

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[4] https://www.rcn.org.uk/__data/assets/pdf_file/0018/450252/004_232_Using_telehealth_V3.pdf

[5] https://www.carbontrust.com/media/507270/ctc830-homeworking.pdf

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Infrastructure

We cannot overstate how consumers, citizens and micro businesses are more reliant than ever on communications services – and particularly mobile devices and their associated network services. Voice, text – and at a rapidly increasing pace, data – are all central aspects to people's lives both collectively and individually. Data networks have enabled an explosion in services provided by an enormous variety of completely new players, with economics that allow a huge variety of individually very small groups of consumers and the economy to be better served in a range of ways. This over-the-top, or app, market is very easy to enter, very competitive and can provide great value to previously unserved consumers and businesses, but only if the data platform is there and capable.

We believe that the ambition should be for mobile voice and data and fixed broadband coverage to be truly ubiquitous – and for mobile voice and data coverage to relate to both indoor and geographic coverage, as well as on roads and rail. There is often a lack of effective competition in rural areas – illustrating a market failure that leaves consumers and small businesses disadvantaged. Unless the fundamental economics of rural coverage provision change, the commercial market alone will never achieve universality - so it is imperative that public policy continues to address gaps in the market; is alert to where these are likely to occur in future provision; and takes steps to address them.

Ninety-seven per cent of premises are able to access a basic broadband service, with download speeds of more than 2Mbit/s; 85% can access a standard service, with speeds of 10Mbit/s or more; and 75% can access superfast speeds of 30Mbit/s or more[6]. There are 3% of households that are in postcodes where next generation access networks are not available and can only receive a service of less than 2Mbit/s. Other households are limited to less than 10Mbit/s. Whilst the percentage seems small, the absolute number is significant and those who are affected deserve a high level of assistance and support. The likelihood is that the market will serve the mass market and not necessarily all consumers; the full reach of a digital infrastructure must be extended somehow. The Government has committed to launching a scheme with local bodies across the UK in 2015 to subsidise the costs of installing superfast capable satellite services. This will build on the previous commitment that there will be at least 95% superfast broadband coverage by 2017 by offering a superfast capable solution to around a further 1% of premises. We would encourage exploration of technology neutral solutions to enable delivery of accessibility to these remaining areas as soon as possible, and close co-operation between government bodies at all levels to ensure that the experiences and strategies of bodies working in one part of the UK, e.g. Community Broadband Scotland, are shared across the whole of the

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[6] http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-14/2_Change_Availability.pdf

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UK. We would support a requirement for all new housing developments and business parks/premises to include the provision of fibre broadband. The gap between the available speeds is increasing – not decreasing. Those who are disenfranchised are becoming increasingly so.

The inclusion of fixed line and narrowband alone in the Universal Service Obligation (USO) – the legal entitlement to a basic service – is outdated. We were encouraged therefore that this month the UK Government has committed to the desire to see every household able to access a USO of 10mbit/s. This broadband USO must include provision for micro businesses. We await the forthcoming consultation with interest – in our view the Government cannot move to "digital by default" for provision of services without committing to universal access to both a fast and reliable broadband service.

It is essential to ensure that basic broadband and mobile data infrastructure is in place across the UK. This goal should not be undermined – unwittingly or otherwise – by the temptation to see ultra-fast speeds as a panacea, or some kind of "holy grail". Whilst the Panel understands, and indeed supports, the ambition and value inherent in ultra-fast speeds we believe that a greater and wider benefit would be achieved from a ubiquitous and universal basic broadband service offering a reliable 10 Mbit/s at an affordable consumer price. This should be a priority. We would therefore encourage an in-depth review of infrastructure competition and investment options as well as that of retail competition. In short, we are concerned that investment in a solid mobile voice and data and broadband infrastructure isn't compromised by other commercial imperatives. In responding to the DCMS' Digital Communications Strategy[7] terms of reference, we suggested that, given the need for robust modelling, a detailed assessment of current provision and the supply market was required.

We believe that infrastructure cannot stand alone and must be linked to digital participation initiatives. The best connectivity in the world is fundamentally undermined if significant numbers of the relevant population are not able to use it to best effect. In our view, social inequalities will be heavily influenced one way or the other by communications availability and effective digital participation (or lack of these things). We discuss the importance of digital participation in greater detail below.

DCMS' consultation[8] on tackling not-spots in mobile phone coverage provided the opportunity for the Panel to call on DCMS to consider national roaming as the solution to quickly and comprehensively tackle partial not-spots, a key issue for us for a number of

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[7] http://www.communicationsconsumerpanel.org.uk/downloads/digital-communications-infrastructure-strategy-terms-of-reference-response.pdf
[8] Response to DCMS' consultation on Tackling Partial Not-Spots in Mobile Phone Coverage – Nov 2014

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years. As highlighted in the DCMS document, partial not-spots affect 3% of UK premises, 10% of A roads, 16% of B roads and 21% of landmass. These figures have a disproportionately high impact in rural areas and may give rise to serious safety issues. However, partial not-spots are ubiquitous across the whole UK, including London and other major cities, particularly in-building.

Whilst we understand that 4G rollout is important, we argued that it is far more democratic and equitable for all parts of the UK to have access to at least some acceptable form of mobile voice and data provision via 2G and 3G than for only some areas to have access to 4G, and others to be left with a vastly inferior service. This is of particular importance given the drive to place more government services online and encourage people to self-serve as part of the digital by default initiative, supporting the case that internet access should be universal.

Consumers have never been able to do anything about not-spots other than buy SIMs from more than one Mobile Network Operator (MNO) and swap them over to gain coverage – which is not a solution, but a costly and inconvenient process; whereas the MNOs do have the capability, technology and financial resources to fix the problem for their customers. Moreover, for many consumers, swapping SIMs is not even a workable solution as their phone is locked to a specific network. Not spots are a particular concern in relation to business owners with a disability and for companies working in many rural areas and outside major conurbations. We would welcome an examination of the economic drivers that would encourage network sharing – particularly in rural areas. This is particularly important given the move to provide enhanced emergency services contact over 4G.

The Panel has welcomed the 4G coverage obligation of 98% indoor coverage UK wide, and 95% in each Nation by the end of 2017, and the Mobile Infrastructure Project (MIP) as tools to increase rural broadband and mobile voice/data coverage. We hope that the undertakings given by MNOs to Government - guaranteed outdoor voice and text coverage from each operator across 90% of the UK geographic area by 2017 and full coverage from all four mobile operators increasing from 69% to 85% of geographic areas by 2017 - will make a significant impact and we will encourage close monitoring of their rollout and efficiency. It is vital that this coverage is rolled out and provides robust and reliable voice and data coverage for consumers and micro businesses. The Panel is concerned about the value and impact of the MIP which seems to have achieved a limited impact to date, and is already near the end of its planned time window.

We are extremely conscious of the need to fully utilise available spectrum. We have encouraged Ofcom to work with mobile network operators to ensure that operators are fully using their allocated spectrum to best and most efficient effect, rather than allow some allocated frequencies to sit unused but remain unavailable to others who may have potentially innovative ideas for their exploitation. Additionally, a European driven focus

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on the release of new blocks of spectrum may be distracting industry from extracting the best of what they have already. The range and penetration characteristics of the 700 MHz band are only marginally better than 800 MHz, yet we do not seem to see the rapid deployment of this much vaunted and highly valuable band, particularly to support rural data coverage extension. We would like to see a much stronger sense of '*use it or lose it*' with spectrum, or much more active spectrum sharing in licensed bands, not just the marginal scraps available in TV white-space for example.

We note that there is no agreed definition of what constitutes an acceptable threshold level to determine 2G voice call coverage. Ofcom's drive testing research conducted for last year's Infrastructure Report identified that a signal level of at least -86dBm was needed to provide good 2G voice call coverage. This level was used to report on 2G mobile coverage levels in the report. 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. We would welcome work to establish an agreed and commonly used definition of what constitutes an acceptable threshold level.

We were encouraged by the Department of Transport announcement that train operators are being asked to set out how they will meet the commitment to provide free Wi-Fi on trains for passengers. We would urge progress on as many lines as possible in the very near future.

We have encouraged much greater availability of free public Wi-Fi, together with advice about relevant security. Availability of public Wi-Fi is currently patchy which, when the signal degrades, significantly affects the user experience. Moreover there is inadequate supervision of the security of such networks and poor information available to the public in terms of their security. MNOs have a key role to play in raising people's awareness.

Despite the developments in superfast broadband and mobile coverage, we consider that there is still some way to go and it is vital that consumers and citizens in the widest sense should not be left behind, left out or left wanting. Excellent network coverage and call quality combined with the provision of better information will help people make better choices – and make greater use of the functions and applications that they want, which in turn we believe will drive up service levels and ensure that a thriving competitive market benefits all stakeholders.

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Market consolidation

Consolidation in the mobile market is an issue of interest to the Panel in the context of consumer impact. The Competition and Markets Authority's recent invitation to comment on one such proposal was an opportunity for us to highlight our concerns that the position of all UK telecommunications consumers must not be weakened in any way by the anticipated acquisition. There is now a risk of even fewer providers offering services to consumers. The consumer should be at the heart of a competitive market and the Panel is concerned that a reduction of players in the communications market risks diminishing competition, consumer choice and service provision. We believe that, outside the economically challenged area of rural provision, competition drives infrastructure investment much more reliably than any amount of consolidation.

It is of significant concern to us that consumers appear to have experienced significant price increases in other European markets (e.g. Austria) where there has been a reduction in the number of MNOs in the market. We have encouraged a detailed and thorough exploration of what safeguards might be necessary to protect consumers.

It is unclear what will happen to the existing Cornerstone and Mobile Broadband Network Limited (MBNL) Joint Venture agreements, should the proposed mergers go ahead. We are keen to understand the role that Mobile Virtual Network Operators (MVNOs) can play in expanding coverage. If MVNOs are able to offer multi-network coverage to their customers, as all foreign visitors get when they roam in the UK, this could alleviate problems in a number of partial not spots. We would be interested to know if there are any commercial barriers – for example exclusivity agreements - where MNOs are preventing MVNOs from fulfilling this role, which would be a swift and low cost solution.

We note the remarks made by Ofcom's CEO Sharon White recently in relation to market consolidation, the Framework and the regulator's ability to act "… *the European Commission and European telecoms regulators have raised concerns that the specialist European framework governing the communications sector may not be sufficiently flexible to allow for the regulation of markets where there is a limited or shrinking number of players - namely an emerging oligopoly.*

This specialist framework allows regulators to intervene ex ante - in other words, to take action to address damaging market features that could harm consumers, before that harm materialises. It therefore offers greater flexibility than merger remedies alone. The problem is that the framework sets too high a bar for regulating cases where no one company has market power but the market is still highly concentrated, and consumers can be made worse off as a result.

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To address any concerns, the framework requires us to show that the market structure is likely to result in a degree of coordination between operators. This may require demonstrating tacit collusion, which by definition is hard to prove.

The European body of telecoms regulators, of which Ofcom is a member, published a paper in June this year raising this issue. It talked of the difficulty of ensuring "the development of effective and sustainable competition" in the presence of what it termed "tight oligopolies", namely highly concentrated markets.

The European Commission has now committed to consider the issue as part of the review of the telecoms framework. This initiative is to be welcomed. I hope it does lead to a revision in the framework so that regulators have the full range of tools to respond to a changing market. This is not about regulators seeking new powers for the sake of it, or regulatory creep. Rather it is a recognition that the statutory framework needs to evolve to deal with emerging challenges in a rapidly evolving sector.

Any new powers would need to be applied proportionately, and with care. Checks and balances should be built into the system to ensure that happens. With a change in the framework we could do more to facilitate the entry of new operators, keep low price deals on the market for longer or require companies to give up spectrum."

We fully support a review of the Framework which preserves National Regulatory Authorities' (NRAs) ability to respond to the evolving needs of their national markets, and to innovate, under a continuation of the existing minimum harmonisation regime, and we oppose a move towards a "full harmonisation" framework. The Framework must enable national regulators to act in the best interests of consumers and citizens and not hamper their ability to intervene where justified and proportionate.

Quality of Service

A key element of consumers' experience of communications, and probably their closest experience of infrastructure issues, is the quality of service that they receive when new services are installed or when faults occur. Ofcom's last strategic review was in December 2003, and led to the creation of Openreach, through which BT is required to provide access to competing providers on equal terms, for them to offer telecoms services to consumers. Ofcom 's recent DCR discussion document notes that this approach has delivered real choice, quality and value for phone and broadband customers over many years but that some challenges remain. For example, the incentive for BT to discriminate against competing providers can be limited by regulation, but not removed entirely. The document notes that BT's network has evolved in recent years, which may require different models of competition than those that worked best for the traditional copper

telecoms network. In addition, Ofcom has been concerned that Openreach's performance on behalf of providers has too often been poor, requiring the introduction of rules for faster line installations and fault repairs. The DCR is addressing these issues, and Ofcom has sought views and evidence on future regulatory approaches. It noted that Virgin Media and a variety of smaller operators own networks which allow them to provide phone and broadband services without using BT's network at all. This kind of 'end to end' competition, which sometimes involves running fibre lines directly to premises, can help incentivise Openreach to improve its infrastructure and the quality of service that it provides.

We make no comment here on how improvements to quality of service could be brought about by retaining or altering the current model of regulation in relation to Openreach and its relationship to BT. We are neutral on that point. However we strongly believe that, by whatever means it is brought about, there needs to be a significant improvement in the quality of service that is provided to consumers. As consumers' requirements and hardware and software become more complex, CPs will also need to move to being able to provide a system of seamless support to consumers. It will no longer be acceptable for consumers to be told that it is an issue outwith the CP's control.

Digital Participation and digital skills

While the advantages of online connectivity apply to all groups in the community, they are especially relevant to disabled people and older people, many of whom may be less mobile than younger people. And yet we know that the take-up of the digital world is unequal amongst the population, with older people more likely to be excluded.

Building on our Consumer Framework for Digital Participation[9] and informed by our 2012 Bridging the Gap: Sustaining Online Engagement research, the Panel identified a number of areas for strategic focus and made a series of recommendations for Governments, policy makers and those delivering on the ground. The Panel has continued to press a range of stakeholders working in digital participation to address the needs of all consumers and citizens.

We now live in an era in which we are seeing many government services become "digital by default" and where being online is becoming more and more a necessity of life and less and less of an optional extra. Whilst solutions may be complex, the issue itself is straightforward: approximately 23% of UK adults lack basic digital literacy skills. The potential consequences of this exclusion are serious: for individuals, especially those who are more vulnerable; for society; for business; and for the UK economy.

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[9] http://www.communicationsconsumerpanel.org.uk/the-consumer-framework-for-digital-participation/the-consumer-framework-for-digital-participation-1

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An increasing number of commercial services are only available online - or delivered offline in a way that effectively penalises the offline community, through high cost or lower quality. Those people still functionally offline will be at an increasing disadvantage and risk being left behind in terms of ease, convenience, inclusion, speed and cost. It remains our belief that unless fundamental action is taken, the digital divide risks becoming an ever greater digital gulf as the distance increases between those who are online and those who remain firmly anchored in the offline world. Digital literacy, especially on security matters, is going to be critical.

Micro businesses

The Panel's remit includes micro businesses (those businesses employing nine or fewer people). There are an estimated 5.2 million private sector businesses in the UK and 95% of them can be classified as a micro business. They account for 33% of UK private sector employment and 18% of turnover. In 2014/15, we commissioned and analysed new research into the communications experiences of micro businesses. We found that communications services play a vital role for these businesses but their use of these services is hampered – with many of their concerns and frustrations echoing those of individual consumers and citizens. A significant number of respondents in our research were dependent on the reliability and performance of residential grade communications services, particularly with respect to the Internet. However, this means that when services are disrupted, there can be longer delays in rectifying issues or repairing faults than would normally be the case in a business environment as businesses are also reliant on residential grade support services. Many micro businesses feel they lack negotiating power or leverage with their communications provider that larger companies enjoy. We have used the findings to give voice to these consumers and discussed the recommendations for action with a number of stakeholders, including CPs around the UK.

The Panel's report, *'Realising the potential: micro businesses' experiences of communications services'*, highlights that, for micro businesses to gain greater benefit from their communications services, action needs to be taken in three key areas: Improved Speeds and coverage; Tailored Services and Information and Advice. In terms of improved Speeds and Coverage, the Panel encourages:

- Government and Ofcom to investigate the effectiveness of methods of increasing mobile coverage as a matter of urgency – including the possibility of national roaming. Improved coverage must also address road and rail coverage.
- Government to explore, as part of the Digital Communications Infrastructure Strategy, a revised minimum requirement for standard broadband connection which would enable micro businesses to support better their online requirements.
- Government to raise awareness of, and stimulate demand for, its small business initiatives, including the rollout of superfast broadband e.g. ensuring micro

businesses are aware of the possibility of aggregating vouchers and are enabled to use growth vouchers to good effect.

Summary

We welcome this inquiry. All consumers, citizens and microbusinesses should have access to the services that they need when they need them; the quality of those services should be high, with reliability paramount.

In particular we would like to see:

- Telecommunications fully recognised as a fourth essential utility and for there to be a serious ambition for mobile voice and data and broadband to be truly ubiquitous.
- A review of the EU Telecoms Framework which enables Ofcom to act in the best interests of consumers and citizens and not hamper their ability to intervene where justified and proportionate.
- The needs of **all** citizens, micro businesses and consumers to be considered, particularly those who are more vulnerable to detriment.
- Work to establish an agreed definition of what constitutes an acceptable threshold level to determine 2G voice call coverage.
- Allocated spectrum being used to best and most efficient effect, rather than allow some allocated frequencies to sit unused but yet unavailable to others – a 'use it or lose it' approach.

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