

## **Ofcom Advisory Committee for Northern Ireland**

### **Response to Ofcom's Strategic Review of Digital Communications: Discussion document**

Ofcom's Advisory Committee for Northern Ireland (ACNI) received a presentation from Ofcom on its Strategic Review of Digital Communications. ACNI members also attended a roundtable discussion event with industry stakeholders in Northern Ireland.

ACNI's comments and observations on the issues raised in the discussion document are as follows:

1. We note that competition, complemented by targeted intervention, has delivered well for Northern Ireland. The ACNI's view is that there is currently no suitable alternative model available. We are keen that the continuation of the current model should maintain the benefits to our consumers and ensure that dis-benefits are contained. ACNI is of the view that there is a need for a USO for broadband and that it should be pitched at about 10Mbps, but reviewed to ensure it remains fit for purpose. ACNI is also of the view that good digital connectivity is essential for full engagement in civic society.
2. ACNI encourages Ofcom in its assessment of the current telecoms market to look beyond the number of properties accessed and consider more widely the consumer benefits in relation to their actual use of services. This includes, for example, the benefits to residential consumers and SMEs of being able to access comprehensive public services online. It is clear some public funding will be needed for a broadband USO but lessons could be learnt from the postal services USO. When being extended it is important to note that one technology will not meet all needs and public sector and private sector funding for provision through various technologies will be needed.
3. The functional separation within the BT Group which created Openreach did not include Northern Ireland. We would urge Ofcom, based on evidence, to consider whether extending any functional separation to Northern Ireland in future would benefit consumers. Were it to happen, care would be needed to ensure there was no dis-benefit to consumers. What is essential is better quality of service regardless of who owns the networks. To this end, quality of service standards and achievements, as well as remedies should be re-examined.
4. Ofcom should do more to further support empowerment at each stage of the consumer's decision-making process by helping ensure that accurate and trusted information is widely available. There is a need to ensure that information is accessible, in different formats and in plain English.

5. ACNI recognises the quality of telecoms market data held by Ofcom, but suggests that Ofcom considers analysing it more forensically and proactively alongside other material (for example, complaint data), in order to inform the market and government in a more focused way. Ofcom should also ensure the accessibility of all relevant material through more effective signposting. The recent online mobile coverage checker is an excellent example of Ofcom signposting.
6. The Committee believes that Ofcom should consider opportunities for deregulation only where the analysis identifies clearly that those consumers who would be affected negatively excludes those who could be considered especially vulnerable.

Ends

8 October 2015