



The Consumer Council response to Ofcom work plan consultation 2020 -2021

25 January 2020

1. Introduction

- 1.1 The Consumer Council has a statutory remit to promote and safeguard the interests of consumers and have specific functions in relation to energy, water, transport, food and postal services. Therefore, we are pleased to comment on Ofcom's Draft Plan of work as the statutory representative for Northern Ireland consumers.
- 1.2 We have responded to the consultation document by commenting on the most pertinent issues for Northern Ireland consumers from Ofcom's strategic priorities and areas of focus.

2. Work Plan response

Better Broadband and mobile – where ever you are

- 2.1 Ofcom's research shows that connectivity in Northern Ireland does not compare favourably to the UK. For example, we still have the highest proportion of premises unable to access decent broadband connections, namely 5% of premises are affected in Northern Ireland, compared to just 2% in the UK. This is more common in rural areas, with 19% of premises affected in Northern Ireland compared to 10% in the UK¹. In addition, ultrafast broadband is available to over half of UK properties (54%) but only 48% of properties in Northern Ireland².
- 2.2 As Northern Ireland has the highest percentage across the UK of premises without decent broadband, consumers are more likely to rely on their mobile phones to conduct online activities. However:
- 25% of the Northern Ireland landmass does not have 4G services from all operators;
 - 39% of premises do not have indoor 4G coverage from all operators; and
 - 2% does not have 4G coverage from any operator.
 - 14% of the Northern Ireland landmass does not have voice coverage from all four operators;
 - 20% of premises do not have indoor call coverage from all four mobile networks; and
 - 1% does not have voice coverage from any operator³.
- 2.3 Access to mobile and broadband coverage is vital regardless of location. We commend the principles behind the UK Government and mobile network operator's delivery of the Shared Rural Network proposal, which seeks to deliver significantly improved 4G coverage to rural parts of the United Kingdom. However, we would seek reassurance

¹ Ofcom *Connected Nations Report 2019*

² Ofcom *Connected Nations Update: Summer 2019*

³ Ofcom *Connected Nations Update: Summer 2019*

from Ofcom that Northern Ireland consumers do not get left behind in this scheme, and receive the same benefits as the other UK Nations, particularly in regards to the use of mobile infrastructure built as part of the Government-owned Emergency services network in GB.

- 2.4 The Consumer Council welcomes Ofcom's work to ensure universality of broadband services designated two Universal Service Providers., BT and KCOM. We note that consumers will be able to start requesting the service from March 2020. As Northern Ireland has the largest percentage of premises in the UK nations, that are unable to receive 10 Mbit/s download and 1 Mbit/s upload speed, we would encourage Ofcom to undertake a communication campaign to ensure consumers are aware of their entitlement under the Universal Service obligation and that any process to request Broadband is clear and easily accessible.

Fairness for consumers

- 2.5 We welcome the work undertaken by Ofcom in relation to creating a Fairness culture for consumers in 2019, with the commitment from the majority of broadband, phone and pay-TV companies signing up to the Fairness for Consumers Commitments.
- 2.6 We note that Ofcom will continue to undertake work in this area, including projects around Broadband differential pricing practices, collective switching, and making data work for consumers. We welcome the commitment by Ofcom to continue to monitor this market and the impact of the voluntary commitments. We are aware most of the commitments made are in a voluntary capacity by operators. Therefore, if commitments are not fulfilled or undue harm is identified to consumers, we would urge Ofcom to be prepared to take swift action if required, particularly as telecoms is a dynamic market.

Sustaining the Universal Postal Service

- 2.7 The Consumer Council acknowledges the work Ofcom has outlined its work on how it will help sustain the universal postal service. We welcome and support the work of the review of the future regulatory framework for post, in particular an assessment of the parcels market and the review of consumer protections. We would ask Ofcom, as part of its parcel market review, to prioritise the issue of parcel surcharges to outlying areas. It is clear that parcel surcharging is not only causing significant consumer detriment to consumers in Northern Ireland, but is contributing to a less competitive and effective functioning parcel market. The issue has been outstanding for too long and action to remedy this problem needs to be taken.

Northern Ireland

- 2.8 We look forward to our continued productive relationship with colleagues in Ofcom's Northern Ireland Office. We note their commitment to continue to work to preserve cross-border communication after the UK leaves the European Union.

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- 2.9 The Consumer Council will liaise with Ofcom as it explores how Brexit will impact postal consumers in Northern Ireland, with the potential regulator customs checks between Great Britain and Northern Ireland, and how this might impact on consumers in terms of costs and quality of service.

3. **Conclusion**

- 3.1 The Consumer Council welcomes the Ofcom Work Plan and priorities for 2020-2021. We reiterate our commitment to continue working with Ofcom for the benefit of consumers in Northern Ireland and would welcome the opportunity to explore further areas of collaboration during 2020-2021.

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