



2 Marylebone Road
London NW1 4DF
t 020 7770 7000
f 020 7770 7600
which.co.uk

25 February 2020

Which? Response to Ofcom's Proposed Plan of Work 2020/21

Which? welcomes this opportunity to respond to Ofcom's proposed Plan of Work for 2020/21. We believe that it has the potential to deliver significant benefits for consumers across the UK. In particular, ensuring that consumers have access to the connections they need to fully participate in the digital world, and that they are treated fairly. Below we set out Which?'s views on Ofcom's proposed plan of work for 2020/21 under each of its strategic priorities.

Better broadband and mobile, wherever you are

Which? is supportive of Ofcom's planned work to achieve better quality broadband and improvements in mobile coverage across the UK. Many parts of the UK continue to suffer with poor quality connections. However, as more services move online, consumers are increasingly dependent on good quality connectivity, requiring access wherever they live, work and travel. It is essential that Ofcom takes the necessary steps to address this issue as soon as possible.

Mobile coverage

Ensuring consumers have good quality 4G mobile coverage is essential. Only 66% of the UK has 4G mobile coverage from all four operators, and this has not changed over the past year, according to Ofcom data.

While we welcome the plans for a Shared Rural Network (SRN) it is critical that this truly delivers improved mobile coverage for consumers. In particular: there must be more detail and clarity on the timescales for delivery and extent to which consumers will benefit from a choice of operators under these plans. There must also be greater transparency for consumers about where and when coverage will be delivered. It is essential that Ofcom does not finalise its plans for the spectrum auction until a final decision is reached by the Government and industry on the SRN.

Broadband

Which? has welcomed the Government's commitment, and Ofcom's work to date, to ensure gigabit connectivity across the UK. It is essential that in encouraging investment in these new networks, Ofcom is mindful of the need for consumers to understand the benefits of these new connections as ensuring consumer take up will be critical.

Thought must therefore be given not only to the supply of these services, but also to the demand for them. Which? has recently proposed to the Government that it should commission a Connectivity Taskforce. This could be led by consumer and business groups to advise on a strategic, evidence based approach to stimulate demand for gigabit capable broadband connections.

Fairness for customers

Which? welcomes Ofcom's ongoing programme of work to deal with unfair business practices and to ensure fairness for customers. While Ofcom's Fairness Commitments are good in theory, it is critical that Ofcom now holds these businesses to account to make sure they are truly putting fairness at the heart of their businesses.

We are supportive of the work Ofcom is doing to help consumers switch more easily. This is particularly important in the context of broadband switching, where there are currently a number of processes in place. Ofcom must ensure that the process is as easy and clear as possible for consumers.

Ofcom must also closely monitor the work being done to move consumers to Voice Over IP, as well as the trials being done for fibre migration. In both instances, it must be as easy as possible for consumers to migrate, and any issues must be identified and addressed as quickly as possible, with disruption kept to a minimum.

We welcome the work that Ofcom is undertaking on Open Communications. In principal we believe that such an initiative has the potential to deliver benefits to consumers in helping to overcome *some* barriers to engagement in the sector and provide new services.

Any Open Communications initiative must be developed with consumer considerations, informed by robust consumer testing, and transparency at its core. This includes ensuring the consumer journey incorporates clear consenting processes upfront, robust protection of consumer data at all times, and appropriate redress which is swift and easy for consumers to access when things go wrong.

Nuisance calls and scams

Which? has campaigned extensively to ensure action is taken to address the consumer detriment that arises due to nuisance calls and texts. We are pleased with the progress that has been made and welcome Ofcom's continuing work to help reduce nuisance calls.

Scams continue to be an issue for consumers. This is an area that can result in significant harm and Which? believes more action must be taken to address this problem. We are happy that the Government is minded to appoint Ofcom to provide a regulatory framework in response to Online Harms. Which? supports a broad approach to online content regulation; and is keen to work with Ofcom to bring 'content that enables scams' under its powers.

We welcome Ofcom's collaborative approach with the FCA to help coordinate an industry led response to scams. Which? is also working with Stop Scams, and we will be increasing our own focus on addressing the consumer detriment arising from scams over the coming year.