



Telecoms and pay TV complaints

Q3 (July – September) 2019

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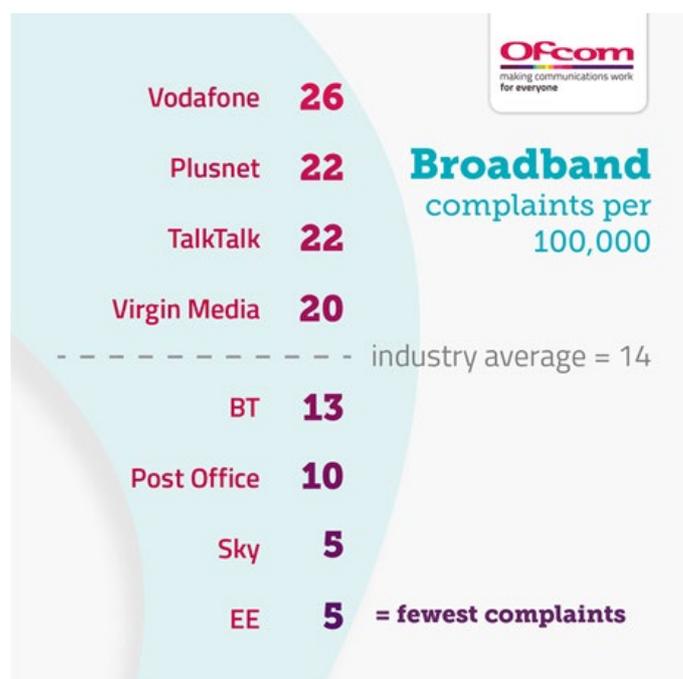
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1. Overview

As the UK's communications regulator, Ofcom receives complaints from consumers about their residential landline, fixed broadband, pay-monthly mobile and pay TV services. To better understand the reasons for consumer dissatisfaction in our sectors, we compile that data and determine the number of complaints received by provider and by service. To account for differences in the size of providers we calculate the number of complaints received per 100,000 customers. We publish that data on a quarterly basis.¹

¹ All complaints volumes are displayed per 100,000 subscribers. All figures rounded to the nearest whole number. Where providers have the same score when rounded this way, results are ranked in the table based on their unrounded value. Actual measurable difference may in some cases be less than one complaint per 100,000. The industry averages are limited to those providers included in this report. All complaints data is sourced from Ofcom's Consumer Contact Team.

Fixed broadband

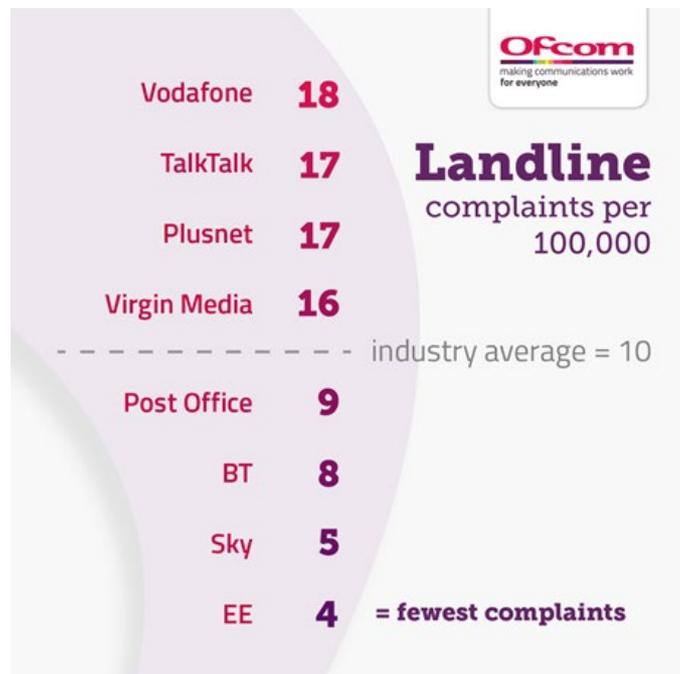


- EE and Sky generated the lowest volume of fixed broadband complaints per 100,000 subscribers in Q3 2019.²
- Vodafone generated the highest volume of fixed broadband complaints per 100,000 subscribers.
- As in Q2 2019, almost four in ten of Vodafone’s fixed broadband complaints were about faults, service and provisioning issues (38%).³ The other main drivers of Vodafone’s complaints were complaints handling (26%) and issues relating to changing provider (15%).
- Plusnet, TalkTalk and Virgin Media also generated complaint volumes per 100,000 subscribers above the industry average.
- The main drivers of complaints across fixed broadband providers were complaints handling (32%) and faults, service and provisioning issues (31%), followed by issues relating to billing, pricing and charges (20%).

² The actual measurable difference between the following fixed broadband provider’s number of complaints per 100,000 customers was less than one and so their results should be considered comparable: 1. Plusnet and TalkTalk; 2. the industry average and BT; 3. Sky and EE.

³ In this instance, ‘service’ refers to, for example, coverage issues, broadband speeds, and restrictions on service.

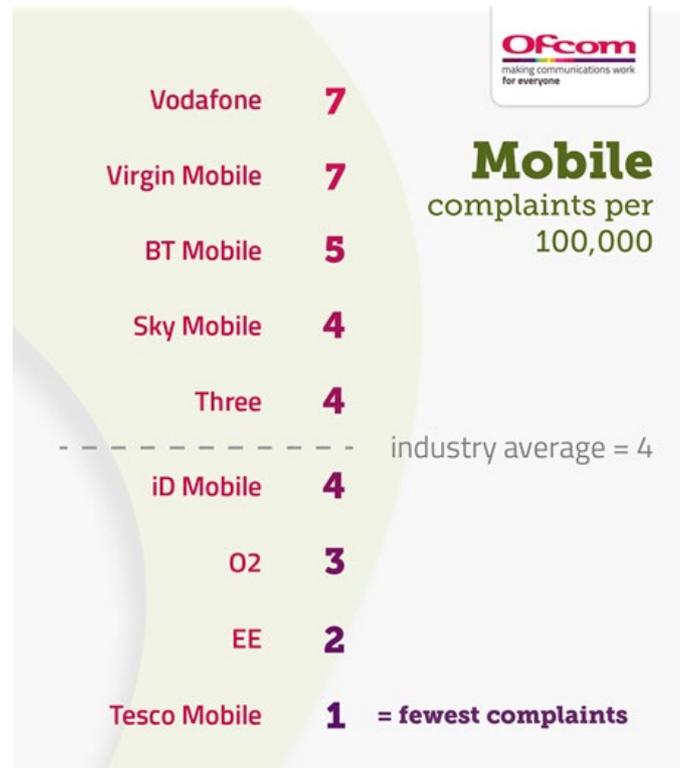
Landline



- EE and Sky generated the lowest volume of landline complaints per 100,000 subscribers in Q3 2019.
- Vodafone and TalkTalk generated the highest volume of landline complaints per 100,000 subscribers, closely followed by Plusnet.⁴
- Vodafone's main complaints drivers were faults, service and provisioning issues (31%), complaints handling (23%), and issues relating to changing provider (23%). TalkTalk's main complaints drivers were complaints handling (28%), faults service and provisioning issues (25%), and issues relating to billing pricing and charges (23%).
- Virgin Media also generated complaints above the industry average.
- The main drivers of complaints across landline providers were complaints handling (33%), faults, service and provisioning issues (25%), and issues relating to billing, pricing and charges (21%).

⁴ The actual measurable difference between the following landline provider's number of complaints per 100,000 customers was less than one and so their results should be considered comparable: 1. Vodafone and TalkTalk; 2. TalkTalk and Plusnet; 3. Post Office and BT; Sky and EE.

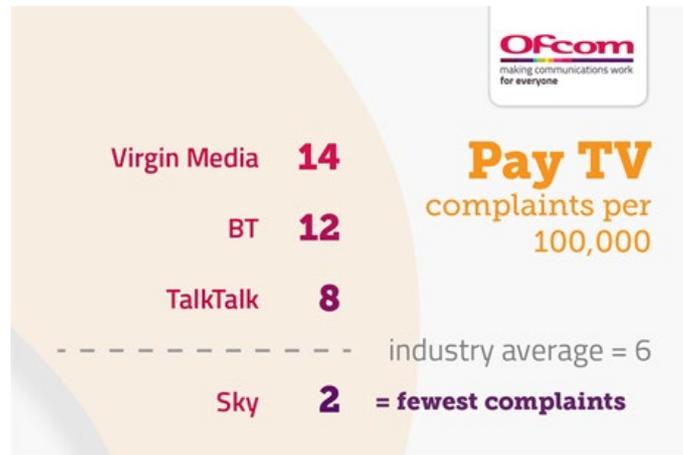
Pay-monthly mobile



- Tesco Mobile generated the lowest volume of pay-monthly mobile complaints per 100,000 subscribers in Q3 2019.
- Vodafone and Virgin Mobile generated the highest volume of pay-monthly mobile complaints per 100,000 subscribers.⁵
- Vodafone's main complaints drivers were complaints handling (35%), issues relating to billing, pricing and charges (26%), and issues relating to changing provider (20%). Virgin Media's main complaints driver was also complaints handling (36%), followed by issues relating to billing, pricing, and charges (23%), and issues relating to changing provider (16%).
- BT Mobile also generated complaints above the industry average (Sky Mobile, Three, iD Mobile and O2 generated complaints per 100,000 subscribers comparable to the industry average).
- The main drivers of complaints across pay-monthly mobile providers were complaints handling (31%), issues relating to billing, pricing and charges (28%), and issues relating to changing provider (18%).

⁵ The actual measurable difference between the following pay-monthly mobile provider's number of complaints per 100,000 customers was less than one and so their results should be considered comparable: 1. Vodafone and Virgin Mobile; 2. BT Mobile and Sky Mobile; 3. Sky Mobile, Three, the industry average, and iD Mobile; 4. the industry average, iD Mobile, and O2; 5. O2 and EE.

Pay TV



- Sky generated the lowest volume of pay TV complaints per 100,00 subscribers in Q3 2019.
- Virgin Media generated the highest volume of pay TV complaints per 100,000 subscribers.
- Over four in ten of Virgin Media complaints were about complaints handling (44%). The other main drivers of Virgin Media complaints included issues relating to billing, pricing and charges (21%), and faults, service and provisioning issues (17%).
- BT and TalkTalk also generated complaints above the industry average.
- The main drivers of complaints across pay TV providers were complaints handling (38%), faults service and provisioning issues (26%), and issues relating to billing, pricing and charges (18%).

2. Trend data

Introduction

- 2.1 This section sets out trend data on residential consumer complaints received by Ofcom across landline, fixed broadband, pay-monthly mobile and pay TV services, by communications provider.⁶
- 2.2 In general, the data is presented on a quarterly basis from Q4 (October to December) 2017 to Q3 (July to September) 2019 inclusive.⁷ Only providers that meet the generally applied criterion for inclusion (having a market share of 1.5% or more in the relevant market) are included in the report. For the period covered we report complaints per 100,000 subscribers.
- 2.3 An [interactive tool](#) accompanies this report, which has now been updated to include Q3 2019 data. It allows readers to search for the data easily (for instance by service or provider) and to make comparisons between different providers.

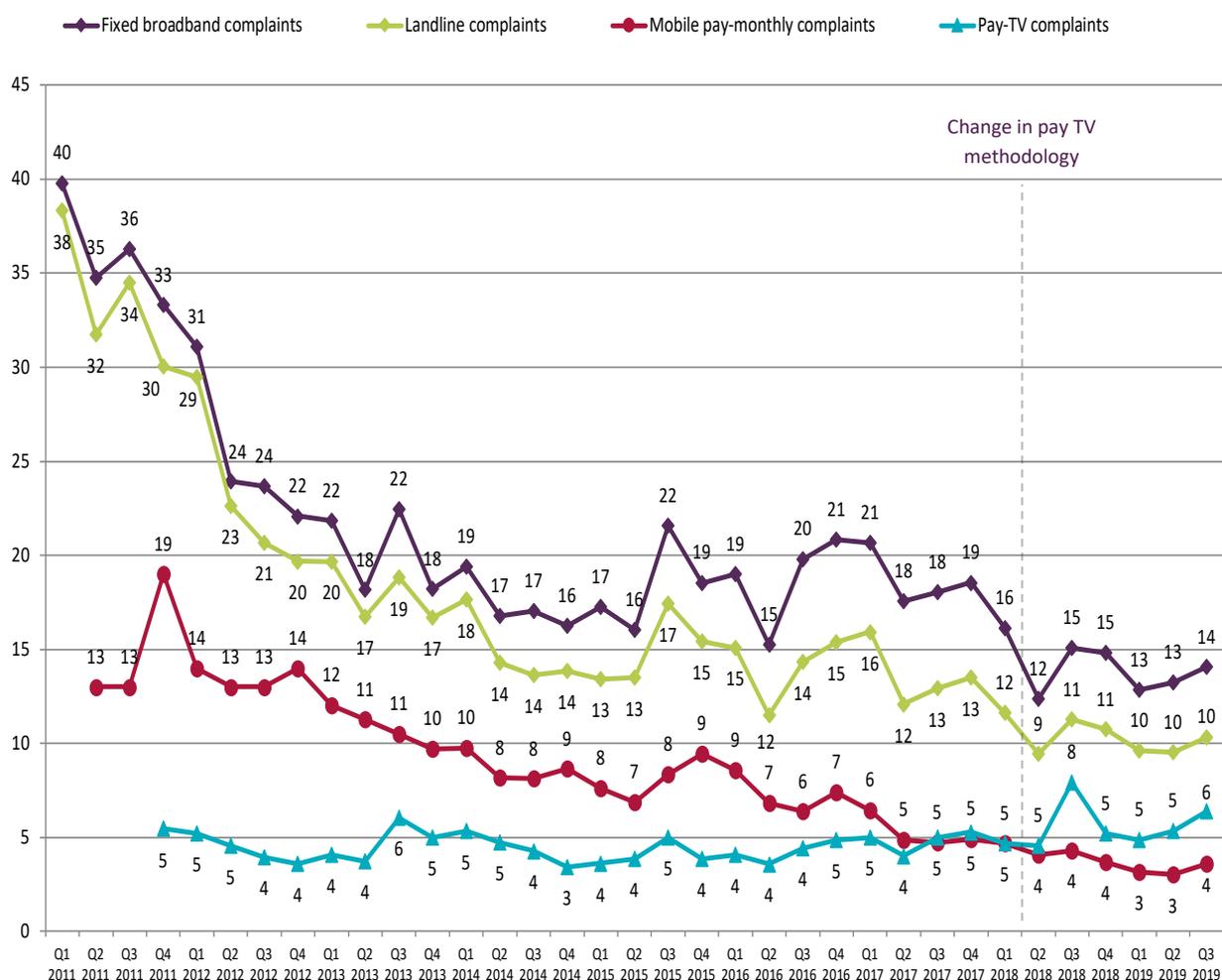
⁶ The industry averages are limited to those providers included in this report. All complaints data is sourced from Ofcom's Consumer Contact Team. As detailed in our Q2 2014 report, we have determined that the current complaint ratios for pay-as-you-go (PAYG) mobile services are too small to enable meaningful comparisons. Given the lack of change in the PAYG results, as of the Q3 2017 report we have not reported PAYG trend data in this report. However, it is still accessible in the [csv file](#) that accompanies this report.

⁷ Figure 1 shows complaint volumes dating further back to: Q1 (January – March) 2011 for fixed broadband and fixed line services; Q2 (April – June) 2011 for pay-monthly mobile services; and Q4 (October – December) 2011 for pay TV services.

Complaints by service sector

- 2.4 By comparison with Q2 2019, the relative volume of complaints for fixed broadband, pay-monthly mobile, and pay TV increased in Q3 2019. The relative volume of complaints per 100,000 subscribers for landline remained broadly the same.
- 2.5 By comparison with Q3 2018, the relative volume of complaints for fixed broadband, landline and pay TV services decreased in Q3 2019. The relative volume of complaints per 100,000 subscribers for pay-monthly mobile remained broadly the same.⁸
- 2.6 Figure 1 shows that fixed broadband and landline services continue to generate the highest volume of complaints per 100,000 subscribers. Ofcom continues to receive fewer complaints about pay-monthly mobile and pay TV services by comparison with fixed broadband and fixed voice services.

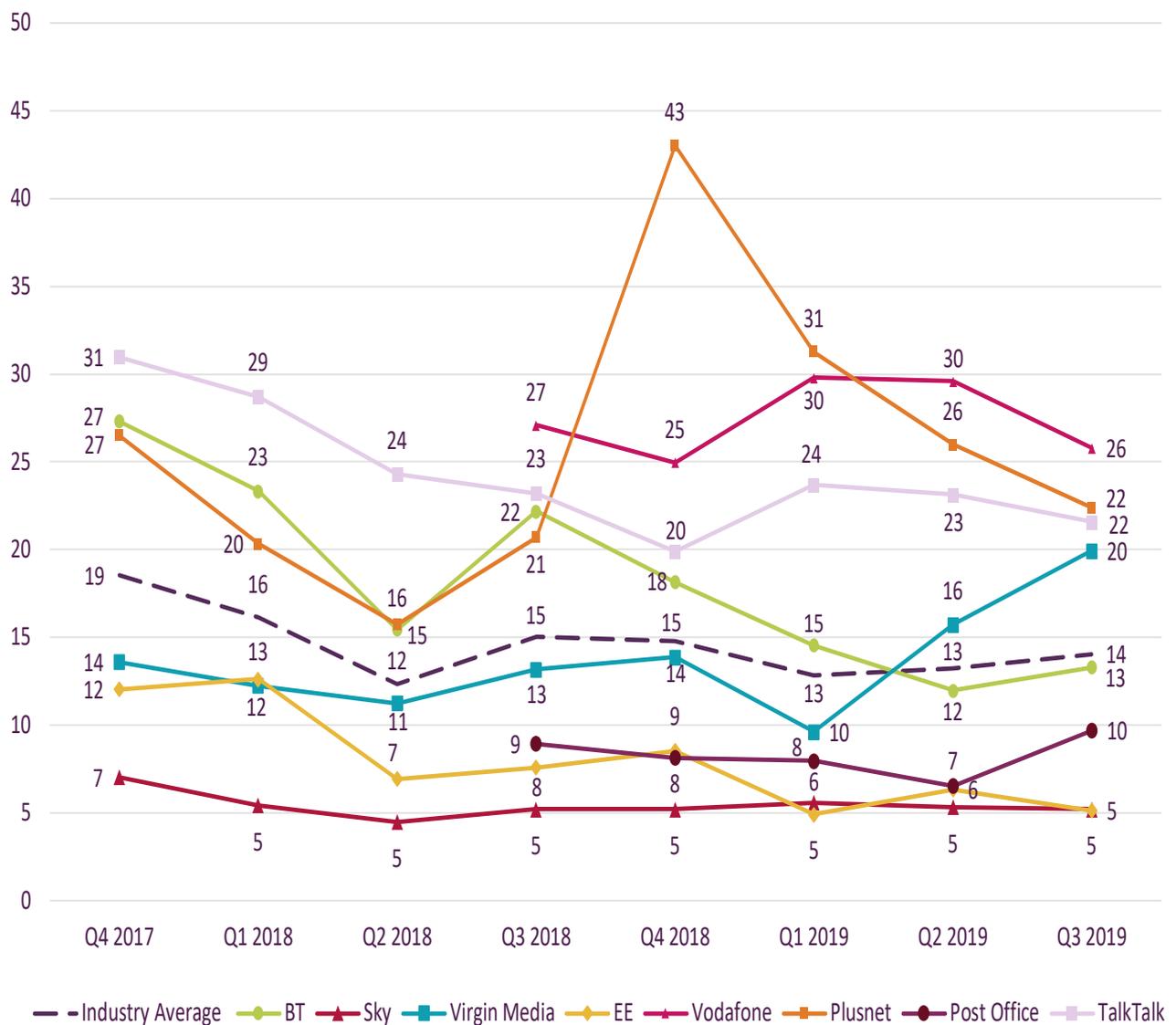
Figure 1: Relative volume of complaints per sector per 100,000 subscribers: Q1 2011 – Q3 2019



⁸ Due to a change in methodology in November 2019, the industry average figures for pay TV complaints per 100,000 subscribers prior to Q2 2018 should not be considered comparable to those from Q2 2018.

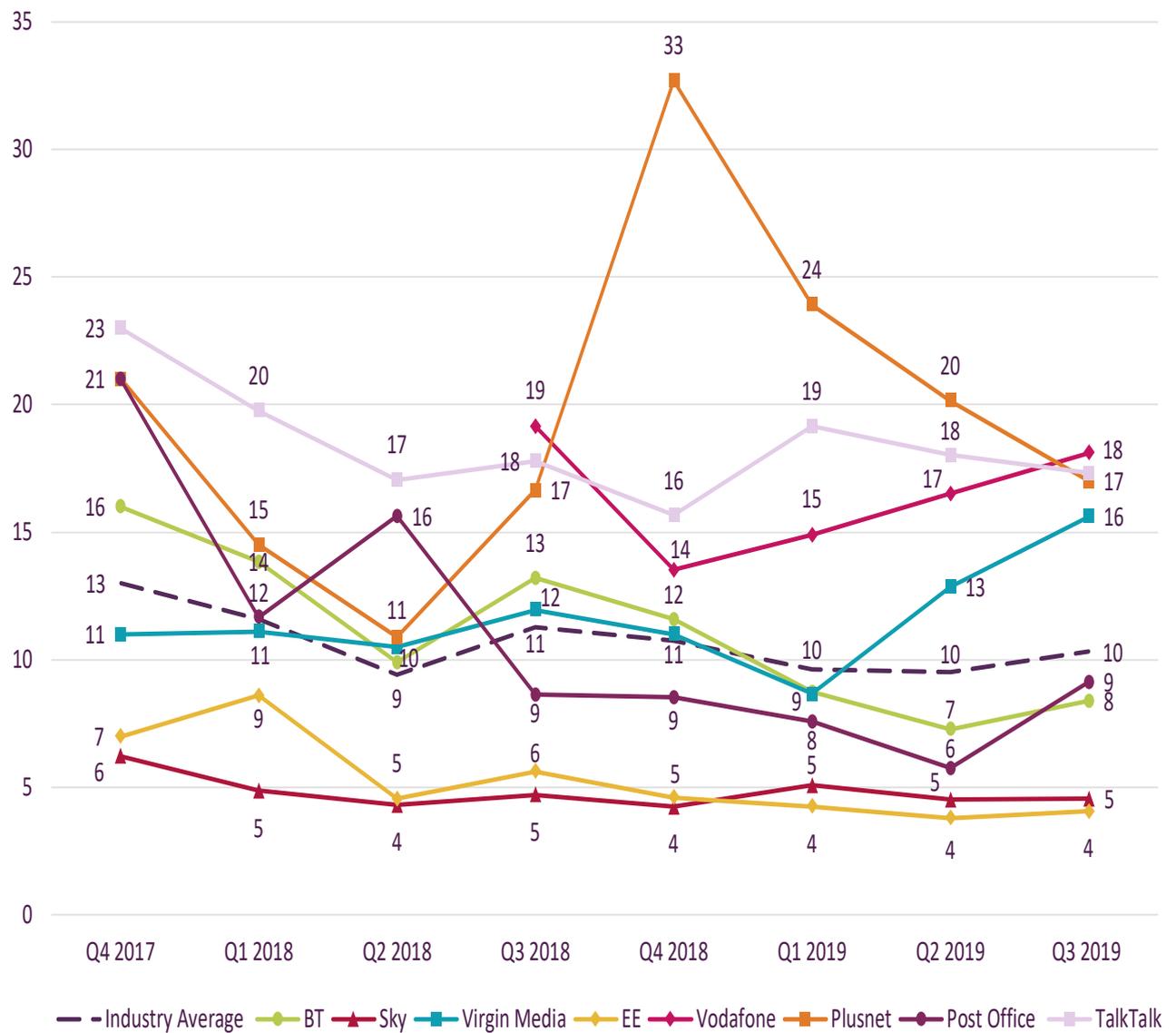
- 2.7 Figure 2 shows that Vodafone continued to generate the highest volume of fixed broadband complaints per 100,000 subscribers in Q3 2019.
- 2.8 Sky and EE generated the lowest volume of fixed broadband complaints per 100,000 subscribers.
- 2.9 Plusnet, TalkTalk and Virgin Media continued to generate complaint volumes above the industry average.

Figure 2: Fixed broadband complaints per 100,000 subscribers: Q4 2017 – Q3 2019



- 2.10 Figure 3 shows that Vodafone and TalkTalk generated the highest volume of landline complaints per 100,000 subscribers in Q3 2019, closely followed by Plusnet.
- 2.11 EE and Sky continued to generate the fewest landline complaints per 100,000 subscribers.
- 2.12 Virgin Media continued to generate complaints above the industry average.

Figure 3: Landline complaints per 100,000 subscribers: Q4 2017 – Q3 2019

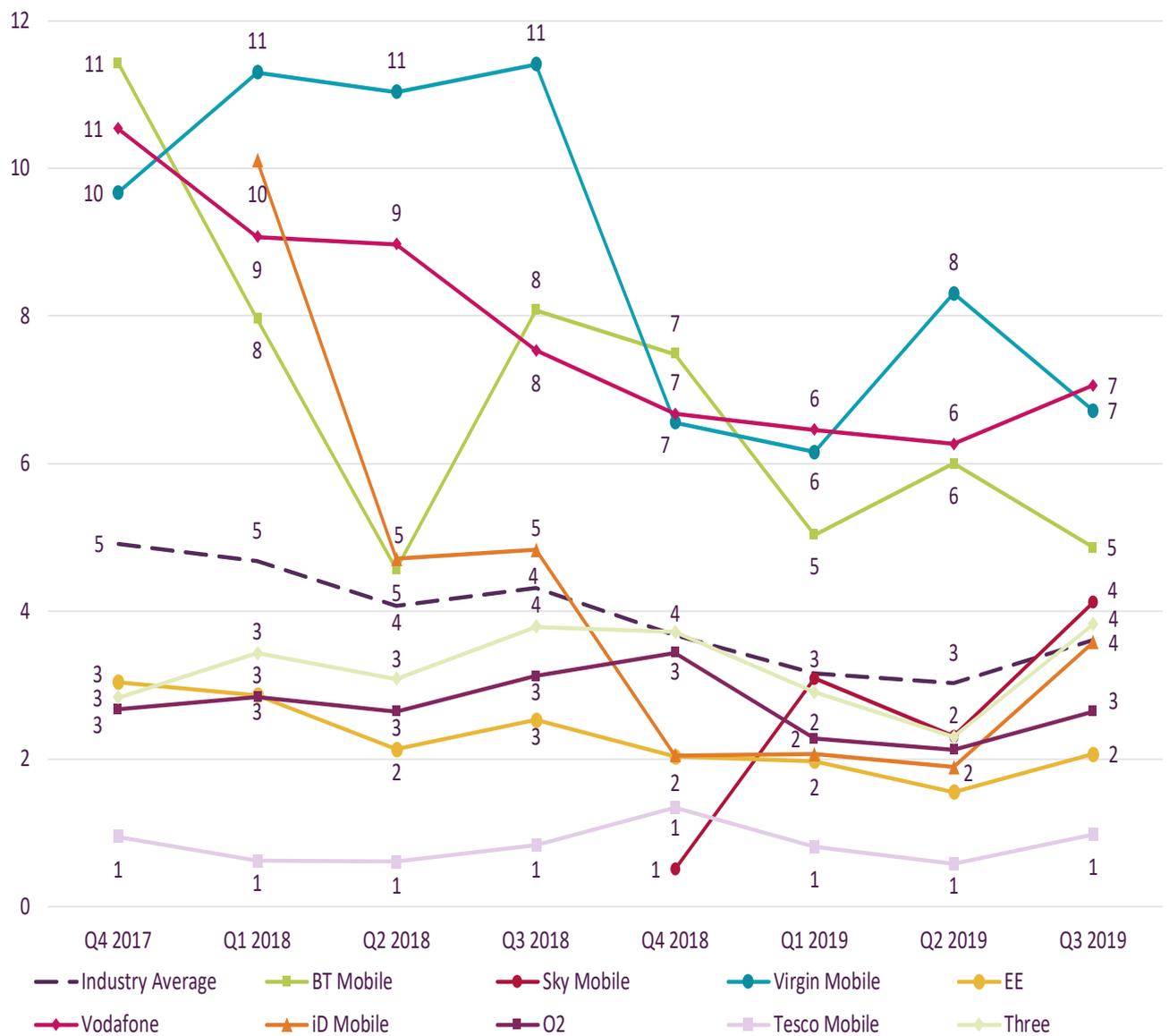


2.13 Figure 4 shows that Vodafone and Virgin Media generated the highest volume of complaints about pay-monthly mobile services per 100,000 subscribers in Q3 2019.

2.14 Tesco Mobile generated the lowest volume of complaints per 100,000 subscribers.

2.15 BT Mobile continued to generate complaints above the industry average (Sky Mobile and Three generated complaints per 100,000 subscribers comparable to the industry average).

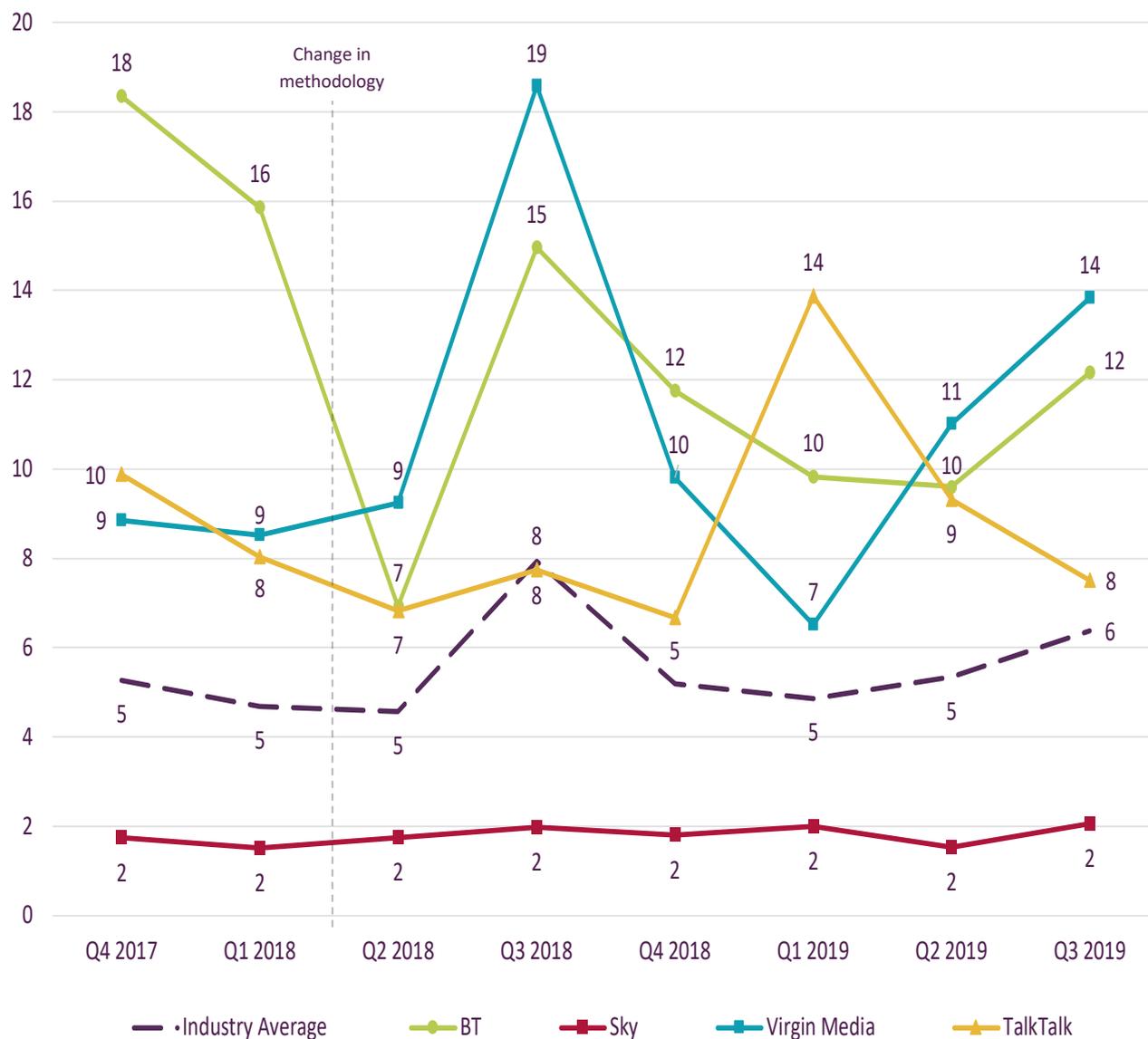
Figure 4: Pay-monthly mobile complaints per 100,000 subscribers: Q4 2017 – Q3 2019



2.16 Figure 5 shows that the volume of Virgin Media pay TV complaints continued to increase and they remained the most complained about pay TV provider per 100,000 subscribers in Q3 2019.

2.17 Sky continued to generate the lowest volume of pay TV complaints per 100,000 subscribers.⁹

Figure 5: Pay TV complaints per 100,000 subscribers: Q4 2017 – Q3 2019



⁹ Due to a change in methodology, the Sky and industry average figures for pay TV complaints per 100,000 subscribers prior to Q2 2018 should not be considered comparable to those from Q2 2018.

3. Background

- 3.1 Ofcom’s principal duty is to further the interests of citizens and consumers, where appropriate by promoting competition. In doing so we must have regard to the interests of consumers with respect to the price of communications services, value for money and quality of service.
- 3.2 Ofcom research suggests that people are broadly happy with their communications services. The proportion of people who were satisfied with their communications services in 2018 was 86% for landline services, 83% for broadband services and 93% for all mobile services.¹⁰ Where concerns arise, consumers typically raise their complaint with their provider in the first instance. If the provider is not able to resolve the complaint within eight weeks, or if they reach deadlock before then, the consumer can make an application to an independent Alternative Dispute Resolution (ADR) scheme. The ADR scheme can examine the complaint and make a judgement on the issue.¹¹
- 3.3 In addition, some consumers choose to contact Ofcom. Ofcom received around 96,000 calls and items of correspondence directly from consumers in 2018/19.¹² Many of these contacts result in complaints and some contain more than one complaint.¹³ These complaints are likely to be made where a consumer has been unable to resolve an issue with their provider to their satisfaction. While Ofcom does not resolve individual complaints, it offers consumers advice on how they might best seek to resolve the issues raised.
- 3.4 We record complaints by service (e.g. fixed broadband or pay TV) and by provider. We use the complaints data to inform policy, enforcement and monitoring work, helping to ensure fairness for consumers.¹⁴

Why publish provider-specific complaints?

- 3.5 Alongside the price of communications services, there are a number of measures that may be useful to help consumers assess the quality and value for money available from providers. Since April 2011 we have published quarterly residential Ofcom complaints data by provider. We have also published research on ‘customer service satisfaction’, on a

¹⁰ Ofcom, [Choosing the best broadband, mobile and landline provider: Comparing service quality](#).

¹¹ Ofcom requires all providers to be a member of an approved ADR scheme: [Ombudsman Services: Communications](#) and the [Communications and Internet Services Adjudication Scheme](#).

¹² [Ofcom Annual Report 2018/19](#), p. 51.

¹³ Where a consumer complains about a single matter, we record that as a single complaint. If they complain about two or more separate matters relating to one service (e.g. fixed broadband), we record that as two complaints. Where they complain about more than two matters, we record the two most serious ones (identified through discussion with the caller) unless it is not possible to determine this (e.g. the contact is made by letter) or the consumer specifically requests that all complaints are logged. Complainants raising more than two matters relating to the same service account for around 1% or less of total complainants in each sector. In general, we record up to two complaints per service per contact. An average of 1.5 complaints were recorded per consumer contact with Ofcom in 2018.

¹⁴ Information on any investigation we launch as a result of complaints to Ofcom can be found in the [enforcement bulletin](#).

provider-specific basis, since 2009. The latest research was published as part of Ofcom's *Comparing Service Quality* report.¹⁵ That report includes additional consumer research and other metrics, broken down by service and provider, showing general levels of consumer satisfaction, satisfaction with reliability and satisfaction with complaints handling, among other metrics.

- 3.6 We recognise that there is no single source of information that can give consumers a full picture of the relative performance of different providers. In addition, different service features will matter more for some consumers than for others. For many consumers, comparative price and network performance information is of primary importance. Ofcom has improved the information available in these areas: examples include the publication of broadband speeds research, mobile coverage maps and our scheme for accrediting price comparison calculators.
- 3.7 The publication of performance data is consistent with our statutory duty relating to transparency and our obligations as a public authority. Consumer information also plays a critical role in ensuring that competitive communications markets work for consumers. The absence of information can lead to poor purchasing decisions and inhibit switching. If such information is not readily available or is unclear, there may be a case for Ofcom to intervene in the interests of consumers. Under section 26 of the Communications Act 2003, we have a duty to arrange for the publication of such information and advice as appears to us to be appropriate to make available to consumers.¹⁶
- 3.8 We believe that our complaints data, along with other information,¹⁷ can be useful for consumers seeking to compare providers.¹⁸ We also observe that the data is of interest to intermediaries such as consumer groups, price comparison services that advise consumers, and journalists. The publication of provider-specific complaints data may act as an incentive for providers to improve their performance.¹⁹
- 3.9 The ADR schemes that Ofcom approves, Communications and Internet Service Adjudication Scheme (CISAS) and Ombudsman Services: Communications (OS), also publish quarterly complaints information regarding their member communications providers that have a market share over 1.5%.²⁰ Similar information is available in a number of other sectors, including for example financial services.²¹
- 3.10 Taking the above into consideration, we consider that the objectives of publishing this report are to:

¹⁵ Ofcom, [Choosing the best broadband, mobile and landline provider: Comparing service quality](#).

¹⁶ Having regard to the need to exclude confidential information from publication. For the reasons set out here, Ofcom considers that, having had that regard, publication of the information in this report is appropriate.

¹⁷ For example, information on price, speeds, coverage, and contract terms.

¹⁸ In the [Statement for our Review of Complaints Procedures](#), we said that publishing complaints data would likely benefit consumers in respect of price, quality and value for money. We also noted that there are a number of ways for such information to be made public.

¹⁹ See the responses of key consumer groups to Ofcom's consultation on complaints handling procedures at:

http://stakeholders.ofcom.org.uk/consultations/complaints_procedures/?showResponses=true.

²⁰ See [CISAS](#) and [Ombudsman Services](#) quarterly case data.

²¹ See, for example, [FCA complaints data](#).

- Ensure transparency of data;
- Further the interests of citizens and consumers by providing them with information that will help them facilitate and take advantage of a competitive market; and
- Incentivise improved provider performance.

3.11 Further information about the methodology for compiling the complaints data, including how we account for the variation in size of provider, limitations of the data and how we record complaints about bundled services, can be found in Annex 1.

A1. Telecoms and pay TV complaints: detailed methodology

Introduction

- A1.1 Consumers, both residential and business, can contact Ofcom with complaints or enquiries over the phone, by letter or through one of the dedicated complaint submission forms on our website.²² All complaints²³ are logged in the same database by Ofcom's Consumer Contact Team (CCT), providing a record of the total complaints that Ofcom has received, as well as details on the services affected and the providers of those services.
- A1.2 In this Annex, we outline key elements of the approach we take to the publication of our complaints data.

Limitations

- A1.3 When considering the information in this report, readers should note a number of important limitations that apply to the complaints information we publish. In particular:
- The data only covers complaints that consumers have chosen to report to Ofcom and does not incorporate complaints consumers may have made directly to their providers or to other agencies (e.g. ADR schemes). As such it only provides a partial picture of complaints relating to any provider.
 - The complaints data reflects the views of consumers as reported to Ofcom and the way we record them. Ofcom has sought to ensure that its data is sound but has not checked the veracity of individual complaints.
 - Contact with Ofcom may reflect the relative (lack of) quality of complaints handling services, as well as the quality of service received. Given this, companies with poor complaints handling processes may feature more prominently than those with good complaints handling processes.
 - Ofcom may see spikes in call volumes from customers of certain providers when we publicise certain types of enforcement action (e.g. investigations, fines) or other high-profile issues arise (such as network failures or where providers make changes to their services).
 - Bigger performance fluctuations are more likely for smaller operators than larger operators because of the smaller numbers of subscribers against which complaints are measured for these operators. This should be taken into account when observing shorter term movements in the data.

²² Refer to: <https://www.ofcom.org.uk/complain-to-ofcom>.

²³ A complaint is an expression of dissatisfaction made by a customer related to the communications provider's services, or to the complaint-handling process itself. Where the complaint is made to Ofcom over the phone, the consumer is asked whether their call is about an enquiry or complaint.

Scope of the data published

- A1.4 We collect complaints data across a wide range of services: broadcasting, telecoms, other spectrum uses, and post.²⁴
- A1.5 The focus of this publication is complaints made by residential²⁵ consumers in relation to landline, fixed broadband, pay-monthly mobile telephony and pay TV services. As consumers complain to Ofcom about a wide range of issues²⁶ we have considered carefully the way we record complaints and what level of data would be useful and robust enough for publication.
- A1.6 In any single call to Ofcom, or other contact with us, a consumer may complain about one or more separate matters. If they complain about two separate matters (e.g. billing and complaint handling) relating to one service (e.g. fixed broadband), we record that as two complaints. Where they complain about more than two matters, we generally record only the two most serious ones per service unless it is not possible to determine this through discussion with the consumer (e.g. the contact is made by letter) or the consumer specifically requests that all their complaints are logged. Complainants raising more than two matters relating to the same service account for around 1% or less of total complainants in each sector. In general, we record up to two complaints per service per contact. An average of 1.5 complaints were recorded per consumer contact with Ofcom in 2018.
- A1.7 The four services covered in this publication are:
- Fixed broadband, which includes copper-based ADSL²⁷ services, cable services and fibre services;
 - Pay-monthly mobile services;²⁸
 - Landline services, which includes complaints against companies that offer both line rental and calls as well as those that supply calls only services; and
 - Pay TV, which includes complaints relating to access to the service but not complaints about the content delivered over the pay TV service. This category includes services provided over cable, satellite, digital terrestrial television or over a dedicated broadband connection.

²⁴ We publish complaints about the content of programmes broadcast on television by provider in our Broadcast and On-Demand Bulletin. Spectrum complaints cannot be reported in more detail as the majority of complaints are about individual instances of interference.

²⁵ Ofcom records business and residential telecoms complaints separately, based on how the individual identifies their contract type when reporting the complaint.

²⁶ We currently record over 159 different categories of telecoms complaints.

²⁷ Asymmetric Digital Subscriber Line Broadband (i.e. broadband over a copper line).

²⁸ Mobile pay-monthly services will include complaints about use of data through a mobile handset but do not include dongles or data cards.

Complaints about bundled services

- A1.8 Many consumers choose to purchase a bundle of services from one provider (for example, landline with a fixed broadband service). Any issues that subsequently arise may affect one or more of those services and this influences how a complaint may be recorded by us.
- A1.9 The approach we take when recording complaints received from consumers who take a bundle of services from a provider is as follows:
- If the complaint only relates to one of the services in the bundle, the complaint is recorded against that single service only. For example, if a consumer has fixed line telephony and fixed broadband as part of a bundle and complains about slow broadband speeds, the complaint would be logged against the broadband service only as it is this aspect of the service that is causing the problem.
 - If the complaint is about an issue that affects a number of services in a bundle, the complaint is recorded against each affected service for that provider. For example, if a consumer complains about being mis-sold a triple play service, the complaint will be counted as a fixed telephony, fixed broadband and as a pay TV complaint for that provider.
- A1.10 This approach enables us to have a record of all complaints received by provider and by service. As we publish total complaints by provider for each service, but not across the services in aggregate, the complaints are not double-counted.

Complaints about transfers to unknown providers

- A1.11 If a consumer is unexpectedly told by their existing provider that a request has been made to transfer their service to another provider, they may complain to Ofcom without knowing the name of the new provider.²⁹ In these circumstances Ofcom refers the case to Openreach to find out recent activity on the line, including applications to transfer and completed transfers. If a request for a transfer has been made by another provider, the complaint is recorded against that other provider. If no request for a transfer has been made, then the complaint is recorded against the existing provider.

Focus on the largest providers

- A1.12 Ofcom records complaints received by it against any provider in the UK. The size of individual providers varies greatly, as does the number of complaints received. As a result, to ensure that this report covers as many providers as reasonably practicable, we adopt a criterion to help us decide which providers are included in the report.

²⁹ Their existing provider may not have visibility of the new provider either and may only be aware that a request has been made to take over the service.

- A1.13 Following a review,³⁰ from Q2 2014 onwards this report now generally includes complaints data for those providers which, for the service being reported, have a stable market share of 1.5% or more in relevant market. ³¹ A provider will generally³² be removed from the report if its market share has dropped below 1.5% for four consecutive quarters.
- A1.14 For providers included in the reporting for periods before Q2 2014, we have not retrospectively adjusted the previous generally applied publication criteria for inclusion (i.e. having a 4% market share and regular generation of at least 30 complaints per month). Therefore, the previous criteria still apply to those reports.
- A1.15 The current scope of the report encompasses the providers set out in Table 1 below. Together, these providers account for at least 95% of each market covered.³³ For the purposes of this report, we collate complaints by individual subsidiaries and brands (we consider different brands owned by a single provider separately).

Table 1: Providers included in this publication

| | |
|---------------------------|------------------|
| Fixed broadband | BT |
| | EE |
| | Plusnet |
| | Post Office |
| | Sky |
| | TalkTalk Group |
| | Virgin Media |
| | Vodafone |
| Pay-monthly mobile | BT |
| | EE ³⁴ |
| | iD Mobile |
| | O2 |
| | Sky Mobile |
| | Tesco Mobile |
| | Three |
| | Virgin Mobile |
| | Vodafone |
| | Landline |
| EE | |
| Plusnet | |
| Post Office HomePhone | |

³⁰ For publications up to, and including, Q1 2014, providers were generally included in the report if they had a relevant market share of 4% and regularly generated more than 30 complaints per month. See our Q2 2014 report for further detail.

³¹ In the absence of exceptional circumstances, in which, should they apply, we may take a different approach. From time to time, new providers may join the group of those whose market share is above 1.5%. New providers will generally be added to the report after a period in which their market share has consistently been above that threshold, such that it should be considered a stable market share above that mark.

³² In the absence of exceptional circumstances.

³³ At least 95% of market for landline services, 97% for fixed broadband, 97% for pay-monthly mobile telephony and 99% for pay TV.

³⁴ This includes Orange, T-Mobile and 4GEE.

| | |
|--------|----------------|
| | Sky |
| | TalkTalk Group |
| | Virgin Media |
| | Vodafone |
| Pay TV | BT |
| | Sky |
| | TalkTalk Group |
| | Virgin Media |

Aggregating data

A1.16 For pay-monthly mobile we present data for Orange, T-Mobile and 4GEE in an aggregated form. The charts throughout the report refer to this data as 'EE'.

Complaints as a proportion of subscribers

A1.17 Given the variation in size of providers, we publish complaints as a proportion of providers' relevant subscriber base to put complaints numbers into context and to help ensure the data is more meaningful for consumers.

A1.18 To achieve this, we use the number of residential subscribers³⁵ provided to Ofcom by the operators in question. We do not collect these returns for pay TV providers. To calculate pay TV complaints per one-hundred thousand subscribers, we use customer data from the providers own published investor reports or, if they are not in the public domain, we request them from providers directly.

A1.19 We understand from providers that quarterly subscription data is generally more robust than monthly data³⁶ and therefore we use quarterly data to calculate the complaints data.

A1.20 There are some differences in the methodologies providers use to compile subscriber figures that they supply to Ofcom. In previous reports we conducted sensitivity analysis of providers' subscriber figures. Ofcom has now carried out further checks on the data provided to us to ensure that it is accurate and of use to those seeking to compare providers. Our checks have shown that providers' subscriber figures used for this report are comparable, and we have concluded that sensitivity analysis is no longer necessary. We will continue to monitor the comparability of providers' data.

A1.21 In instances where there is little material difference between operators' complaint levels, for example an absolute difference between providers complaints per 100,000 subscriber figures of less than 1, we treat their performances as equivalent.

³⁵ Note that it is possible for an individual to have more than one subscription.

³⁶ Particularly where the quarterly data is reported externally.

Approach to provider subscriber figure adjustments

A1.22 Occasionally, providers re-submit their subscriber figures after publication of one of our complaints reports: for example, where it finds the data it gave us was incorrect. If a provider subsequently resubmits its subscriber figures, Ofcom will not usually adjust historic data unless the discrepancy has a significant impact on the results.

The industry average line

A1.23 As an additional data point against which to measure the performance of each provider, we include an industry average line. This shows the average number of complaints per 100,000 subscribers across all the providers included in the published data for each service. It does not include smaller providers who generally have a market share lower than 1.5%.