

Thank you for the opportunity to comment on Ofcom's draft Annual Plan for the coming financial year. This is a non-confidential personal response, drawing on years of experience in the sector, primarily working with consumer groups.

I would like to see the following three missing points added to the plan:

1. As electronic communications become more and more pervasive in our society, there is an increasing need for **properly resourced independent consumer representation**. This point has been made many times over the years, and is supported in the current Citizens Advice draft workplan for the coming financial year. For historic reasons, there is a striking mismatch between the resources devoted to consumer representation in posts (not to mention energy) and that devoted to electronic communications. As well as its low budget, the embedding of Communications Consumer Panel (CCP) within Ofcom limits its scope for action. While Ofcom itself may not be able to bring about much greater resources for consumer representation, they could press for legislative change to enable some penalty revenue to be devoted to this end (along the lines of Ofgem's consumer redress options).
2. There's also a growing need for Ofcom to **work closely with other regulators**, not just for enforcement purposes (as in nuisance calls) but also to achieve coherent policies and consumer protection. Relations with ICO are critical given increasing concerns about use of data, both personal and not personal. And to get (for example) consumer-facing IoT devices under proper control will call for co-ordination not just with ICO but across the piece (e.g. with road traffic authorities for connected and autonomous vehicles, or with health authorities for smart health devices). Since most such devices use wireless communications, Ofcom's spectrum licensing could be a valuable means for encouraging or where necessary imposing compliance with non-telecoms regulations. It would be good to see something about such joined-up working in the plan. Maybe a set of inter-agency MoU is needed.
3. It's now some time since a working party convened by CCP, with some Consumer Forum for Communications members, made recommendations on improvements to **Ofcom's consultation processes**. It would be timely to schedule a review of what improvements have been adopted in practice.

Regards
Claire

Claire Milne
Antelope Consulting