

Steve Unger
Group Director, Strategy, International, Technology and Economists
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

By email: annualplan2018@ofcom.org.uk

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Dear Steve

Ofcom Annual Plan consultation 2018/19

We write in response to Ofcom's proposed annual plan for 2018/19.

uSwitch, part of ZPG Plc, is supportive of Ofcom's strategic objectives and broad approach, but we are disappointed that Ofcom's work plan appears to have missed some proportionate and timely opportunities to improve how consumers interact with the broadband and mobiles market.

We see that the push for full-fibre is gathering real pace within industry and among policymakers. While this is clearly welcome, all too often can the policy consideration of full-fibre networks be focused on supply side incentives and less on how to boost the demand side. Bringing as many consumers as possible along in the journey to better infrastructure will be critical to its success.

Considering the next generation of infrastructure also creates the ideal opportunity to revisit how the consumer experience in telecoms markets can be improved, uSwitch will shortly be launching a campaign advocating changes that will help consumers experience connectivity without complexity.

One specific area that will be covered by our campaign, is the need to better leverage industry data to achieve better consumer outcomes. In particular, opening up access to provider and product specific broadband speeds and mobile coverage data via APIs. This is an issue we have raised with Ofcom on a number of occasions.

In broadband, uSwitch believes that providers should give third parties property specific broadband speeds, so that consumers are informed of the exact speeds they can expect to receive for each provider and product available. By doing this, consumers could compare their options relative to their own current frame of reference, rather than looking at often abstract and technical aggregate statistics. We believe this will increase uptake of super-fast and ultra-fast services as the benefit of upgrading becomes clearer. Critically, this would also have the benefit of building a better business case for providers to invest in these services.

We note that Ofcom has tried to facilitate data access with some providers in the past, but these have so far been unsuccessful in opening up the required data. In any event, we believe the data being considered would fall short of what is required in order to give consumers a simple and complete picture of their options at their point of decision. We believe consumers should be able to review the property specific speeds quoted by providers far earlier in the purchasing journey – for example, at the point of comparison, where it would deliver most value to consumers.

For broadband in particular, we see this as a natural extension of Ofcom's Broadband Speeds Code of Practice project, which concerns exactly the data points we would like to see available from CPs via API. We consider that Ofcom's Digital Economy Act powers are entirely sufficient to require this of CPs.

We appreciate that Ofcom has resource constraints and it has to prioritise which projects it wishes to take toward. However, we are firmly of the view that in the context of the future of the UK's network infrastructure, this sort of measure has the potential to offer very significant consumer and market benefits, for a modest amount of Ofcom project time.

As part of this consultation, we ask that Ofcom reconsider whether a project looking at options in this space be included in the 2018/19 work plan.

We would of course be happy to discuss in further detail proposals for how this might work in practice.

Yours sincerely



Richard Neudegg
Head of Regulation, ZPG Plc