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Dear Mr Gettings

Which? response to Ofcom's Proposed Annual Plan 2018/19

Which? welcomes this opportunity to respond to Ofcom's proposed annual plan for 2018/19. We consider that Ofcom's planned programme of work has the potential to deliver significant benefits for UK consumers, ensuring that they have access to a wide range of good quality communications products and services. Below, we set out Which?'s views on Ofcom's proposed Annual Plan 2018/19 under each of its long-term strategic goals.

Promoting competition and ensuring markets work effectively for consumers

We welcome Ofcom's proposals to support investment in network infrastructure. Enabling communications providers to invest in their own fibre network will lead to better consumer outcomes, specifically greater choice and quality products and services.

Which? is supportive of Ofcom's proposed work to help consumers engage with communications providers. Consumer engagement is important to ensure a well functioning communications market that works in the interest of consumers. It is essential that Ofcom identifies, considers and tests remedies to address the barriers to engagement in communications markets so that consumers make informed decisions and benefit from competition in the market.

Secure Standards and Improve Quality

There are many areas of the UK that continue to suffer with poor broadband, mobile data and voice coverage. Ofcom must take urgent action to address the UK's connectivity needs now. We urge Ofcom to consider ways in which coverage can be improved prior to the next spectrum auction. This is a critical issue which is becoming ever more important to address as consumers are increasingly reliant on smartphones and mobile data.

Which? welcomes the work that Ofcom plans to undertake to ensure that the existing coverage obligations are met. It is essential that Ofcom's findings from this work are published. It is also imperative that as part of the next round of spectrum auctions, Ofcom considers how it can use coverage obligations, or other incentives, to improve coverage in the UK.



Now a decision has been reached by the Government on how to deliver the broadband Universal Service Obligation, Ofcom must consult swiftly on the relevant aspects of the Universal Service so that it can be in place by 2020 and ensure that the implementation of the USO delivers for consumers by increasing connectivity cost-effectively.

Protecting Consumers from Harm

Which? is pleased with the progress that Ofcom has made in relation to nuisance calls. This is an area that Which? has campaigned on extensively and supports Ofcom's ongoing work to address this issue. We also welcome Ofcom's continuing commitment to protecting vulnerable consumers.

Engage during changes to European legislation

Ofcom has a wide range of relationships across the communications industry, both in Europe and the rest of the world. It must seek to maintain these relationships as the UK leaves the European Union. We also welcome the work that Ofcom plans to undertake throughout the Brexit process to safeguard and protect UK consumers.

Approach to regulation

The range of annual reports and information published by Ofcom continue to be essential tools to help consumers understand the markets Ofcom regulates. Which? welcomes the work that Ofcom is doing to look for new ways to empower consumers through the provision of better and more accessible information. Ofcom must monitor the market and explore ways to make relevant, user friendly information available to consumers. We consider that this will help consumers engage in the market, making it easier for them to obtain products and services that best meet their needs.

Conclusion

Overall, we welcome the scope and direction that Ofcom have outlined in the Annual Plan for 2018/19. This includes incentivising infrastructure investment and continuing work on helping consumers engage. However, we urge Ofcom to take greater action to address the UK's connectivity needs. Across Ofcom's proposed work plan, it is essential that action is taken as quickly and effectively as possible, leading to significant improvements for UK consumers.

Yours sincerely

A handwritten signature in black ink that reads 'Pete Moorey'.

Pete Moorey
Director of Advocacy and Public Affairs