

Your response

Citizens Advice Scotland ('CAS'), our 60 member Citizen Advice Bureaux ('CAB'), the Citizen Advice consumer service, and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. The aims of the Service are:

- To ensure that individuals do not suffer through ignorance of their rights and responsibilities or of the services available; or through an inability to express their needs; and
- To exercise a responsible influence on the development of social policies and services, both locally and nationally.

The CAS Utilities Policy Team puts consumers at the heart of policy and regulation in the energy, post and water sectors in Scotland. We carry out research and gather evidence, which we use to improve outcomes for consumers.

We welcome the opportunity to respond to Ofcom's Proposed Annual Plan for 2019/2020 and have set out our views on these proposals below:

CAS strongly supports Ofcom's move towards universality of broadband and mobile services (3.4) particularly in rural areas. [Data from Ofcom](#) has shown that outdoor telephone calls can only be made from 40% of the geographic area of Scotland (compared to 70% of UK overall), and that mobile data is only available from 31% of Scotland's geographic area. We hope that this work by Ofcom can help to address this disparity. Similarly, we are glad to support work on network infrastructure (4.38) where we can add value, including in providing evidence of the benefits of improving mobile coverage in Scotland.

CAS is supportive of Citizen Advice's work to date in the area of bundled mobile contracts and differential pricing practices including the 'loyalty penalty', and we are glad to see Ofcom continuing to take action in order to protect consumers from these potentially harmful pricing practices (3.11 and 3.12).

We will soon publish work on vulnerable consumers after working with partners including UKRN on where we could best add value. Once published, we hope our findings and recommendations will be considered by Ofcom as part of their work in relation to vulnerable consumers (3.16 and 4.25).

CAS will review with interest Ofcom's report on Royal Mail's regulatory financial reporting and cost modelling of its delivery network (4.5)

We agree with Ofcom on the need to strengthen the consumer voice in telecoms (4.26) as current consumer advocacy arrangements reflect neither the centrality of telecommunications in contemporary life nor the severity of potential detriment when things go wrong. We support the Communications Consumer Panel's work in this area but would like to see this work continue as part of a much broader, comprehensive approach to consumer advocacy in the telecommunications sector, involving an independent consumer advocate equivalent to existing arrangements in, for example, the energy sector – another area of critical infrastructure. We have set out our views on this more fully in our response to the [UK Government's Consumer Green Paper](#), but we believe truly effective consumer advocacy arrangements in the telecommunications sector would include a dedicated advocate for consumers in Scotland – where geography and

demographic distribution have in the past been used as justification for poor or no service. Scotland regularly tops lists of worst broadband speeds in the UK¹ and Ofcom has previously found that while outdoor telephone calls can be made from 70% of the geographic area of the UK, that's true for only 40% of the geographic area of Scotland.² This evidence highlights the need for a dedicated consumer advocate for Scottish consumers in the telecommunications sector.

CAS welcomes Ofcom's commitment to continue to monitor and engage with stakeholders on the issue of parcel delivery surcharges (5.6). CAS research found that consumers living in northern Scotland pay on average 30-50% more for parcel delivery than consumers in other parts of the UK.³ Ofcom's previous work on this issue found that that 'in most cases, the surcharge applied by the parcel operator is greater than the cost incurred by the operator in relation to third party delivery'⁴ suggesting that more information is needed to understand how parcel operators apply different prices across the UK. CAS, as a member of the Consumer Protection Partnership (CPP) task team on parcel surcharging, would welcome support from Ofcom as we work to unpick the complex relationship between the actual cost of delivery to the surcharged areas and the prices passed on to consumers.

We note with interest Ofcom's plans to work with businesses, organisations and other stakeholders to address the communications needs of SMEs in Wales (5.16). CAS research found that SMEs in Scotland can also be disadvantaged by their location in a number of ways – including limited access to reliable broadband, location-based delivery surcharges and delayed deliveries⁵ – so we are keen to be kept informed of any outcomes from this work that may also be relevant to Scottish SMEs.

CAS welcomes Ofcom's plans to improve the accessibility of communications market data by publishing an interactive data portal (Annex 2).

Wherever possible, CAS would also support Ofcom's data being gathered with a Scottish sample size large enough for us to conduct within-Scotland analysis. We'd be happy to discuss this further with Ofcom

¹ BBC (2017) [Scottish areas worst for broadband speeds, says Which?](#)

² Ofcom (2017) [Connected Nations Report](#)

³ CAS (2017) [The Postcode Penalty: Delivering Solutions](#)

⁴ Ofcom (2017) [Annual monitoring update on the postal market \(2016-17\)](#)

⁵ CAS (2018) [Delivering for Business: Scottish SMEs use of Postal Services](#)