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Which? response to Ofcom's proposed Annual Plan 2019/20

Which? welcomes this opportunity to respond to Ofcom's proposed Annual Plan for 2019/20. We consider that Ofcom's proposed programme of work has the potential to deliver significant benefits for UK consumers, ensuring they have access to good quality communications products and services. Below, we set out Which?'s views on Ofcom's proposed Annual Plan under each of its long-term strategic goals.

Promote competition and ensure that markets work effectively for consumers

Which? is supportive of Ofcom's plans to continue its programme of work to encourage consumer engagement. Ensuring that consumers have the right information available to them will help them to better engage in the market. This will ensure that the market functions well and works in the interest of consumers. Ofcom must carefully consider what data is most relevant and useful to consumers, so that they can make informed decisions and benefit from competition in the market.

Secure standards and improve quality

There are many parts of the UK that suffer with poor quality connectivity. Which? considers that Ofcom must take further action to ensure that consumers have access to good quality connectivity wherever they are. The quality of the UK's connectivity is a critical issue. As more services move online and consumers become increasingly dependent on their smartphone, it is essential that the issue is addressed as soon as possible. As such, Which? is pleased Ofcom is prioritising work to ensure that all UK consumers have access to good quality connectivity as part of its Annual Plan.

In particular, we have welcomed the work undertaken by Ofcom to date on the broadband universal service obligation (USO). However, it is essential that Ofcom ensures that the implementation of the USO delivers for consumers efficiently and cost-effectively. In implementing the USO, Ofcom must be mindful of other schemes to improve broadband coverage to ensure that consumers get the best possible connections without confusion. Therefore, we are pleased to see that Ofcom will be considering how the USO will interact with other programmes such as the R100 programme in Scotland.

Which? welcomes Ofcom's plans to improve mobile coverage. According to the Ofcom's Connected Nations 2018 Report, there are still c. 23% of UK premises that do not have a

good 4G signal indoors from all operators. It is essential that further action is taken to address this problem. Therefore, we believe the obligations attached to the 700MHz auction should be ambitious. We also believe that to deliver the level of coverage that UK consumers expect additional measures will be required. We are pleased that Ofcom will be looking at further options to help improve coverage, particularly in rural areas. Ofcom and Government must work together and promptly ensure that their shared vision of ubiquitous mobile coverage is realised.

Protect consumers from harm

Which? welcomes Ofcom's continued work in dealing with unfair business practices which exploit unsuspecting customers. We welcome the work that Ofcom is doing in relation to handset inclusive contracts. It is imperative that consumers do not pay for handsets that they have already paid off - Ofcom must bring this practice to an end. In addition, we would like to see Ofcom taking forward the recommendations made by the CMA in its response to the super-complaint on the "loyalty penalty" in relation to mobile and broadband.

Which? is pleased with the progress that has been made to date on nuisance calls. Which? has campaigned extensively to ensure that action is taken to address the consumer detriment that results from nuisance calls and texts. Therefore, we are supportive of Ofcom's plans for ongoing work to continue to deal with this issue.

It is essential that the move to Voice over IP services is as easy and simple as possible for consumers and that disruption is minimised. We also welcome Ofcom's continued commitment to protecting vulnerable consumers.

Engage during changes to European legislation

Ofcom must continue to maintain its relationships with those in the communications industry, both in Europe and the rest of the world, as the UK leaves the European Union. We are supportive of the work that Ofcom plans to undertake to ensure that any transposed European legislation meets the needs of UK consumers.

Conclusion

Which? welcomes the work that Ofcom has proposed in its 2019/20 Annual Plan. We are particularly pleased that universal connectivity is a key priority area, along with dealing with unfair practices exploiting consumers. Across Ofcom's work plan it is essential that action is taken as quickly and effectively as possible to deliver benefits for consumers. Furthermore, Ofcom should seek to ensure that its priorities for the coming year are aligned with Government plans in this area, to make sure that there is a joined up approach to the key issues and a shared future vision of the sector.

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