

## **FCS Response to Ofcom's Open Communications Consultation**

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### **Introduction**

The Federation of Communication Services represents companies which provide professional communications solutions to (primarily) business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio.

Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest national and international private enterprises and public-sector users. FCS is the largest trade organisation in the professional communications arena in the UK, representing the interests of around 300 businesses who supply B2B services nationwide. Please note that the views expressed by FCS in this response do not reflect the views of Gamma, whose individual response has been submitted separately.

### **FCS Response**

We welcome the opportunity to respond to Ofcom's consultation, setting out its initial thinking on the potential benefits of an "Open Communications" initiative.

As there are no specific proposals at this stage, we have produced a short, high level response to the current Ofcom consultation rather than responding to the individual consultation questions. FCS is highly sceptical that this type of initiative will deliver the envisaged benefits in the communications sector. Specifically, we believe that this is not a useful or appropriate approach to the business market.

We believe that the UK comms sector already has a very good record of innovation and diversity of provision, delivering choice, value and quality service to customers of all kinds.

We are not convinced that the parallel between the financial services and communications sectors is a valid one and we do not recognise the challenges experienced by customers (especially business customers) which are set out by Ofcom with regard to selecting communications services or providers.

Specifically, we do not think the proposed approach will be beneficial for business customers who are already able to customise provision of their services and benefit from tailored solutions, combining a range of technologies, to meet their communication needs.

We think the type of data sharing proposed is not only unlikely to deliver significant benefits for customers but will be onerous and expensive for CPs (especially smaller providers) to accommodate and is unlikely, as a regulatory intervention, to be proportionate.

Further, we believe that the proposed approach, based on a prescribed and limited set of data, may not consider all the relevant factors when recommending a switch (e.g. future proofing or mobile network coverage)

Much of the relevant data on e.g. local broadband speeds is already available and is already used by CPs when evaluating the best solutions for their customers

Previous experience of this type of information sharing initiative, the industry "Topcomm" website which provided customers with comparative Quality of Service information, is not encouraging. The information put into the public domain via the website was not valued by or used by customers and the site was withdrawn in 2009.

Finally, we are concerned that there is a danger that sharing simple pricing information, without an appropriate context, will simply lead to undercutting by competitors, not necessarily delivering the best experience for customers.

FCS hopes that these comments are helpful to Ofcom in its considerations. We would be happy to discuss the issues in more detail as Ofcom evolves its approach and more specific proposals emerge.