

## Your response

Question	Your response
<b>Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.</b>	<i>Is this response confidential? – No</i>  <i>Please see our full response to the question below.</i>

INCA welcomes the opportunity to respond to Ofcom’s consultation on proposals to amend its guidelines on how to help ensure customers in debt or struggling to pay are treated fairly.

INCA is the UK trade association representing over 150 members which are supporting, planning, building and operating sustainable, independent and interconnected full fibre and wireless networks that advance the economic and social development of the communities they serve and permit the provision of applications and services through open competition, innovation and diversity.

Whilst the nature of services and tariffs that INCA members provide obviously varies, our members provide a wide choice of competitively priced services, and many members also offer specific social broadband tariffs.

INCA members are committed to ensuring that vulnerable customers have access to appropriate tariffs. However, some member companies have expressed to us that, despite availability and promotion of such services, take-up can remain low, compared to the potential number of eligible customers.

One hurdle to this, is, we believe, identification of such individuals, something that even local authority and housing association partners of INCA members, have seemed to struggle with. INCA and its members stand ready to work alongside Ofcom, government and other stakeholders to help best identify these individuals, so that competitive and bespoke broadband tariffs that are already in the market, can best reach those individuals who can most benefit from them. One option may be to work with government, so that operators can access existing, or develop new, APIs that can check a citizens’ eligibility for social tariffs.

Our specific comments on the specific revisions to the guide proposed by Ofcom are as follows:

### **Guide para 4.33**

INCA members’ experience is that enforcing eligibility criteria on social tariffs can prove to be costly and ineffective. Given that various tariffs exist that do not have eligibility criteria, but are still providing a low priced broadband package (in some instances lower than other social tariffs that include eligibility criteria), it will be important that Ofcom still includes such offers within any social tariff definition (even if eligibility criteria do not feature).

### **Guide para 4.53**

We are aware of the requirements of the government’s breathing space scheme and will highlight this to members.

**Guide para 4.54**

It is pertinent to note that information will be reviewed as part of the new General Conditions being introduced in June. Operators are therefore likely to look to that to consider any improvements that can be made based on this new proposed guidance.

**Guide para 4.55**

It is important that companies retain the right to suspend service for non-payment and where they have been unable to make contact with the customer. Not having this option may mean have unintended and unwelcome consequences for customers, such as an increase in volume of credit checks for prospective customers, which could increase the number of consumers unable to access an Internet service.

**Guide para 4.56**

Many INCA members have introduced a social tariff.

We think it is unlikely that a customer would be willing to share full details of their income and expenditure with their Communications Service Provider as would be required to complete a Standard Financial Statement. This work is more appropriately done by the specialist debt advice agencies. As such the guidance should encourage Communication Service Providers to signpost customers towards the appropriate agencies and not attempt to complete a Standard Financial Statement with the customers themselves, as proposed in the draft guidance.