

BT response to Ofcom consultation on improving broadband information for customers

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BT Group

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1 Executive Summary

We support Ofcom’s aims to ensure that customers are given key information at an appropriate time in the order journey to help them to choose the right broadband service to meet their needs and to encourage customers to migrate from older broadband technologies to FTTP.

We agree with Ofcom’s proposals for providers to use one- or two-word consistent terms to describe the underlying technology of their broadband service in product cards and in pre-contract information and contract summary documents, and to include a link to a short explanation of what the one- or two-word terms mean. We believe that providing this information alongside existing key information we already supply to customers is the most effective way of meeting Ofcom’s aims to provide customers with more information on underlying technology.

We understand why Ofcom has reached the view that providers should no longer use the term ‘fibre’ to describe anything other than FTTP. However, as we currently call our FTTC packages ‘fibre’ this will require us to make significant changes to multiple touchpoints and systems across our three consumer brands and also in our business customer facing unit. We want to do this properly and ensure there is consistency across all channels and customer touchpoints in the order journey and in-life. For reasons explained further below, this means we will need 12 months to complete all the changes required, far longer than Ofcom’s current proposed 12-week implementation period. We are still in the process of carrying out a full impact assessment, but it is likely that we can implement some aspects of Ofcom’s proposals, once confirmed – such as more overt links on our websites to existing explanations of the difference between FTTC and FTTP – sooner than the more complex changes including the renaming of all our FTTC-based portfolio.

Whilst we understand that Ofcom’s assessment is based on how to give customers more information to ensure they are making the right purchase decision, there is an inconsistency with the ASA’s approach to the term ‘fibre’. We would like Ofcom to make it clear that their position has no reflection on the ASA’s established position that using the term ‘fibre’ to describe FTTC in advertising is not misleading. We’d also like to understand Ofcom’s expectations for underlying technology descriptions in relation to future customer propositions which are increasingly likely to offer constant, resilient connectivity through convergence of fixed and mobile technologies.

2 We support Ofcom’s aims to ensure customers get the right information to make informed purchasing decisions and to promote full fibre take-up

We support Ofcom’s consultation aims to ensure that customers are given key information at an appropriate time to help them to choose the right broadband service to meet their needs and to support customers in migrating from older to newer technologies. The information on underlying fibre technology should complement the existing set of information we already supply without giving customers information overload.

2.1 The information we already provide to customers

We already provide lots of relevant, helpful information to customers in our order journeys before customers purchase with us. On the main page of our BT and EE websites we provide a link to information on Fibre and Full Fibre broadband, the differences between them and the underlying technology we use to deliver the service.¹ Once a customer enters their postcode into the checker on any of our brands’ websites or is redirected from a price comparison website, they will be shown product cards which detail key information on price, speed², contract length and any extra/upfront costs (see Figure 1 in Annex 2).

We also provide practical information on what customers can do with each of our packages. Our own research and Ofcom’s supports that this is information that customers really want to know about.³ On BT’s website we provide this information in the product card (see Figure 1 in Annex 2) and on EE’s website, customers can use our ‘broadband speeds explained’ tool below the product card to compare what they can do with the different speed tiers we offer (see Figure 2 in Annex 2).⁴ On Plusnet’s website customers can click through on ‘estimate your speed’ to find information on the right package for a typical type of usage.⁵

Once the customer is at the checkout stage, they are shown a further summary of their order with key information, (see Figure 3 in Annex 2 below) and before they purchase with us, they will be provided with further key information on their service in the pre-contract information and contract summary document. Whilst the terminology used to describe FTTC is not in line with Ofcom’s proposals, this all demonstrates our commitment to helping customers understand what they are buying and to make the right choices.

¹ <https://www.bt.com/broadband>, customers can then click on ‘About Full Fibre broadband’ or ‘About Fibre Broadband’ to learn more; <https://shop.ee.co.uk/broadband> customers can then click on ‘All about fibre broadband’ or ‘All about full fibre’. These pages also include extensive FAQ information.

² For customers on BT packages, we also offer a Stay Fast speed guarantee on all packages, and we explain further via a link in the product card that this means we constantly check and optimise speeds, so customers can feel confident in the reliability of their speed.

³ Ofcom’s own research found 96% of customers found it useful. Ofcom Broadband Terminology Research, November 2022.

⁴ <https://broadband.ee.co.uk/select-your-speed>

⁵ [Choose Broadband | Plusnet](#)

2.2 Full fibre take-up

We are committed to promoting full fibre take up. On BT and EE, will always sell the best fixed technology available for a customer, which is in part driven by industry efforts to increase take up of FTTP networks (see table below). We will only highlight FTTC offers if customers are in an area without FTTP or are currently on FTTC and are re-contracting with us. For example, an EE customer could choose “Fibre Plus” (see Figure 1) because that gives them the speed they require and we will seek to provide that service over FTTP if it is available in their area, rather than FTTC, for the same price.

<i>Example Technologies available for a customer</i>	<i>Customers shown</i>
<i>FTTP, FTTC, Copper</i>	<i>FTTP</i>
<i>FTTP, Copper</i>	<i>FTTP</i>
<i>FTTC, Copper</i>	<i>FTTC</i>
<i>Copper</i>	<i>Copper</i>

✂

We have spent £ 30 on advertising of new EE full fibre and £ 30 on BT full fibre advertising in the last year alone, resulting in c. 30 customers taking full fibre or upgraded from standard fibre to full fibre packages in the last year across both brands.

This all demonstrates that we are already fully aligned with Ofcom’s aims to support and encourage take-up of full fibre.

3 The consistent terms used and the content of the long description should be truly useful for customers

The information on underlying technology needs to be delivered in a way that is clear to customers and is easily accessible in order to bring about the consumer benefits that we all want to achieve.

3.1 Method of delivery

We agree the best place to deliver this information is within the existing set of key information (as explained above). Underlying technology information can also sensibly sit within the pre-contract information and contract summary documentation under ‘*description of services*’ without adding too much information to the current templates.

3.2 FTTC can no longer be called ‘fibre’

In principle, we accept that in order for Ofcom to fulfil its aim to provide clearer information to customers on the technology used to deliver their services, the term ‘fibre’ should only be used when referring to FTTP. However, as our FTTC packages are currently called ‘fibre’, changing all product names and touchpoints will take a lot of development work and cost. This means we will need more time to implement these changes (see section 4 below).

3.3 One- or two-word consistent terms

A short and consistent set of terms to describe the underlying technology will likely be easier for customers to understand and appropriate to fit within the product cards. We assume that these terms will be required whether for FTTP, FTTC, Copper or another technology mix, especially as Ofcom’s research shows that “*a significantly lower proportion found the description of cable broadband matched their understanding compared to the other three services [FTTP, FTTC and Copper]*”.⁶

3.4 Long description of the one- or two-word consistent terms

We believe a short explanation of what the one- or two-word terms mean would be useful to customers. It is appropriate to deliver this through a link to a landing page to ensure it is easily

⁶ Ofcom Broadband Terminology Research, November 2022.

accessible for customers who want more detail on the underlying technology delivering their broadband. We already provide information on underlying technology on our website today.⁷

⁷ BT information on FTTP and FTTC: <https://www.bt.com/broadband/full-fibre-learn>, EE Information on FTTP: <https://shop.ee.co.uk/features-and-articles/what-is-ftp-broadband>, Plusnet information on FTTP and FTTC: <https://www.plus.net/broadband/full-fibre/#:~:text=Our%20FTTP%20broadband%20is%20called,copper%20cables%20to%20your%20home.>

4 The 12-week implementation period is too short for the systems changes required to implement this

4.1 Implementation period

BT and EE Consumer:

Ofcom's proposed 12-week implementation window is too short. We will need at least 12 months to implement these requirements from the date of Ofcom's final statement. Our broadband packages are currently called 'fibre' and 'full fibre' so we will need to launch new product names across all our brands which will take significant time and cost.

We intend to make these changes for new and re-contracting ("front book") customers only in BT and EE, as making these changes for both front book and existing ("back book") customers would be more complex and take more time and resource. However, we will need to explain to existing customers what these changes mean, particularly because the products offered in customers' EoCNs and ABTNs will be named differently and could cause confusion. For example, a customer's current product could be called 'Fibre Essential' but they are now being offered 'Broadband Essential' in their EoCN and may think this is inferior to the product they are currently on. To explain this is not the case, we will either need to contact customers to let them know about the change or at the very least add further explanations in all our customer communications (KCI) about why the product name has changed.

The implementation of this variable content to all our standard KCI templates is complex. In addition, we want to do this properly and ensure there is consistency across all channels and customer touchpoints in the order journey and in-life for front book customers going forwards, to prevent any customer confusion. This will require changes to 17 different areas across the Consumer business unit alone. Of these, 5 areas have been scoped as 'large' changes, 2 as 'medium' and the remaining as 'small'. As an example of one such large change we will need to rebuild \times broadband products in our BT systems alone, each one individually configured. Also, some of these products have the same codes sitting behind them for FTTP and FTTC, therefore requiring them to be split into two products.

If we scope this implementation around the expected time of Ofcom's final statement in October (Q3 2023/24 as per Ofcom's annual plan), the earliest we could launch this is Q3 2024/25. This is because there is a long lead time between change requirements being specified and the systems changes being designed, built and released.

Plusnet:

For Plusnet, all of the touchpoints listed above will need to be changed, but due to how Plusnet systems are set up, we will likely rename both existing and new products at the same time. Like BT and EE, this change will take at least 12 months to complete. This is based on recent experience of developing the Plusnet Full Fibre portfolio, where the technology build for the new product took 6 months, and then it took a further 6 months to incorporate the products

into the customer facing journeys across both new acquisition and existing customer regrade journeys.

Plusnet will also have to communicate this change to the existing customer base to explain why the name of the service they are receiving has been changed. Given that ⅘ of the Plusnet customer base are on FTTC services we will need to spread these communications over a number of months to ensure we have enough capacity in the customer service teams to handle any questions customers may have from the name change. This activity will generate significant cost for Plusnet and create complexity in managing the customer base as we will have multiple versions of FTTC based services that will need managing in life at a time when the brand is trying to simplify its portfolio to improve customer experience.

Across all brands (EE, BT, Plusnet), we will need to change the following:

Touchpoint	How many touchpoints need to change	Size of the change
Product names & descriptions (S code changes)	Thousands	L
Tariff guide	Thousands	S
T&Cs & legal documents (channel T&Cs)	Small Number of touchpoints	S
Digital Presales	Small Number of touchpoints	S
Digital Help & Support	Small Number of touchpoints	S
Digital Community	Small Number of touchpoints	S
Digital product cards	Multiple, linked to product build	M-L
Digital order journeys	Multiple	M-L
Agent systems	4 (1 per brand)	M
Agent order journeys (incl. DSR & Lightico)	Multiple, linked to product build	L
Agent training	~10,000 advisors	M
KCIs	Multiple	L
Billing	Multiple, linked to product build	S
Welcome comms & BTL marketing including contract information, EoCN and ABTNs	4	S
ATL marketing incl. TV, papers, billboards, social, flyers	4	S
Retail store marketing	1	S
Packaging & leaflets	Up to 4	S

Business customers:

Similarly, we will need at least 12 months to implement the proposals for business customers whether we make the changes to new (front book) products only or to new and existing products.

If changes were made only for new and re-contracting customers, the following touchpoints/systems would need to build brand new codes and journeys:

Touchpoint	How many touchpoints need to change	Size of the change
Product names & descriptions (S code changes)	Hundreds	L
Price List	Hundreds	S
T&Cs & legal documents (channel T&Cs)	Small	S
Digital Presales – Omnichannel	Multiple	S
Digital Help & Support	Multiple	S
Digital order journeys	Multiple	M
Agent systems inc. Lightico	10	M
Sales Procedures inc. CRFs, Frameworks	Multiple, linked to product build	L
Agent training – Provision / Repair	Thousands	M
KCIs	Small	S
Billing	Multiple, linked to product build	S
EoCN Mapping	Small	S
Retail store marketing – Best of Both	1	S

4.2 Cost

Ofcom suggests there will be “*minimal cost to industry*”⁸ in implementing these measures. Taking into account all of the information points that need to be changed across all brands, we estimate costs of ₤ to implement these measures fully, based on the Consumer business unit only.⁹ This is by no means a minimal cost and it has not been built into this year’s annual budget. Whilst we are supportive of Ofcom’s proposals, we want to ensure that their materiality is not underestimated by Ofcom.

⁸ Paragraph 3.51 of Ofcom's consultation on improving broadband information for customers.

⁹ Given the limited time we have had to scope these changes, Ofcom should note this estimate is based on our knowledge of previous implementations and in reality the cost could be higher.

5 Other considerations

5.1 The need for clarity in relation to different regulatory approaches

Since March 2011, the ASA has regulated claims on websites, including product names and product descriptions. The term “fibre” was already being used to describe FTTC broadband services at that time and in 2017 the ASA concluded that this practice was not misleading. The term allowed providers to differentiate FTTC from older copper lines and, even when the technologies were fully explained, consumers did not believe they would have changed their purchase decisions. The ASA’s position was endorsed by the High Court following City Fibre’s failed Judicial Review in 2018/19.

We understand Ofcom’s assessment of the term ‘fibre’ is based on how best to equip customers with information to make the right purchase decisions, whereas the ASA is applying a different and stricter assessment based on whether the term ‘fibre’ is misleading to customers. But even though Ofcom is applying a different test, its approach appears inconsistent with the ASA’s established position. In compliance with the ASA’s rules, providers can continue to advertise part-fibre services as “fibre” on TV, in social media etc. and on their own websites up to the service check, at which point the terminology description and product name would need to change to comply with Ofcom’s new guidance. Clearly this would be confusing for customers, and we want to be consistent in our terminology across all customer touchpoints. For the avoidance of doubt, we would like Ofcom to make it clear in its final statement that the approach in its guidance has no bearing on the ASA’s position that the term ‘fibre’ is not, and has never been, misleading.

5.2 Future proofing this guidance

We did not note any consideration within the consultation on how Ofcom considers new technologies should be displayed to customers. Ofcom should be mindful that as we move towards convergence of mobile and fixed technologies, there will be less of a distinction for customers between what is delivered over fixed or mobile networks. Consumer preferences have already moved towards tailored, bundled services with connectivity at the centre¹⁰; this is usually driven by cost saving and the desire for a reliable connection, and often disregards the technology used to deliver the service. We want to check that Ofcom has considered alternative technologies for delivering services (e.g FWA and mobile plus fibre or copper) and their compatibility with this guidance to ensure it is future-proofed.

¹⁰ Ofcom Pricing Trends Report, December 2022 - https://www.ofcom.org.uk/__data/assets/pdf_file/0029/248546/pricing-trends-in-UK-Communications-services-report.pdf “79% of UK households purchased two or more communications services from the same service provider as part of a bundle in 2022, unchanged since 2020”.

Annex 1

Consultation questions:

Question 1: Do you agree with our proposals to issue guidance under GC C2.3, GC C1.3 and GC C1.5 to clarify:

(1) that the description of broadband services should be consistent and include a one- or two-word description of the underlying technology; and

BT response: Please see our response in section 3.3 above. We agree that a short and consistent set of terms to describe the underlying technology will likely be easier for customers to understand and appropriate to fit within the product cards and in contract information.

(2) that the use of the terms 'fibre' and 'full-fibre' in the information that is provided to customers should only be used to describe fibre-to-the-premises (FTTP) services.

BT response: Please see our response in section 3.2 and section 4 above. In principle, we accept Ofcom's proposal that the term 'fibre' should only be used when referring to FTTP. However, as our FTTC packages are currently called 'fibre', changing all names and touchpoints will take a lot of product development work and cost, which means we will need 12 months to implement these requirements.

Question 2: Do you agree with our proposal for providers to give an explanation of the one- or two-word terms used to describe the service, in a way that can be easily accessed by customers?

BT response: Please see our response in section 3.4 above. We believe a short explanation of what the one- or two-word terms mean would be useful to customers and that it is appropriate to deliver this through a link to a landing page to ensure it is easily accessible for customers who want more detail on the underlying technology.

Annex 2

Figure 1 – Examples of BT and EE broadband product cards

Full Fibre Essential	Full Fibre 1	Most Popular Full Fibre 2
<p>36Mb Download speed</p> <p>24 month contract</p> <p>Was £30.99 £26.99^A</p> <p>Save £125.99</p> <p>Free P&P and no upfront costs</p> <p>No landline phone service</p> <p>Customise your package</p> <p>Checkout now</p> <p>Everyday browsing and streaming for all of life's essentials</p> <p>18Mb Stay Fast Guarantee 10Mb Upload Speed</p> <p>What these speeds mean for you</p>	<p>50Mb Download speed</p> <p>24 month contract</p> <p>£31.99^A</p> <p>Free P&P and no upfront costs</p> <p>No landline phone service</p> <p>Customise your package</p> <p>Checkout now</p> <p>Browse, stream and download on a few devices at once</p> <p>25Mb Stay Fast Guarantee 10Mb Upload Speed</p> <p>What these speeds mean for you</p>	<p>74Mb Download speed</p> <p>24 month contract</p> <p>Was £34.99 £29.99^A</p> <p>Save £149.99</p> <p>Free P&P and no upfront costs</p> <p>No landline phone service</p> <p>Customise your package</p> <p>Checkout now</p> <p>Stream, game and download in HD on lots of devices at once</p> <p>34Mb Stay Fast Guarantee 20Mb Upload Speed</p> <p>What these speeds mean for you</p>

Offer ends: 0d 7h 24m 58s Fibre Broadband	Offer ends: 0d 7h 24m 58s Fibre Plus	Regional discount - save up to £276 Full Fibre Max 100
<p>Av. Speed 36 Mb/s</p> <p>£28 for EE pay monthly mobile customers £31 for new customers</p> <p>24 month plan</p> <p>+ 10% monthly discount, 5GB mobile data boost and Apple TV 4K option for EE pay monthly mobile customers</p> <ul style="list-style-type: none"> ✓ 36 Mb/s estimated download speed ✓ 18Mb/s minimum guaranteed speed ✓ No landline <p>Free set-up</p> <p>Annual price changes apply</p> <p>More Details</p> <p>Choose Fibre</p>	<p>Av. Speed 74 Mb/s</p> <p>£31 for EE pay monthly mobile customers £35 for new customers</p> <p>24 month plan</p> <p>+ 10% monthly discount, 5GB mobile data boost and Apple TV 4K option for EE pay monthly mobile customers</p> <ul style="list-style-type: none"> ✓ 74 Mb/s estimated download speed ✓ 34Mb/s minimum guaranteed speed ✓ No landline <p>Free set-up</p> <p>Annual price changes apply</p> <p>More Details</p> <p>Choose Fibre Plus</p>	<p>Av. Speed 100 Mb/s</p> <p>£28.50 for EE pay monthly mobile customers £32 for new customers</p> <p>24 month plan</p> <p>+ 10% monthly discount, 20GB mobile data boost and Apple TV 4K option for EE pay monthly mobile customers</p> <ul style="list-style-type: none"> ✓ 100 Mb/s estimated download speed ✓ 50Mb/s minimum guaranteed speed ✓ No landline <p>Free set-up</p> <p>Annual price changes apply</p> <p>More Details</p> <p>Choose Fibre Max 100</p>

Figure 2 – Further information on speeds

BT



Broadband speeds made simple

Your speed estimates include three different things: your download speed range, your Stay Fast Guarantee and your upload speed range.

It's important to know that the speed ranges we show are estimates. Your actual speed depends on your location, line, home wiring, Wi-fi connection and time of day.

How the Stay Fast Guarantee works

You'll get your very own Stay Fast Guarantee speed when you join with us.

We constantly check and optimise your speeds, but you can also test the download speed to your hub in My BT. If it's slower than it should be, we'll run checks to fix the problem and send out an engineer if needed.

If we can't get your Stay Fast speed back to where it should be within 60 days of a problem being reported, you can claim £20.

At that point you can also leave your contract without penalty. This is because we've signed up to the [Ofcom Voluntary Codes of Practice on Broadband Speeds](#).

EE

Broadband speeds explained

If you're not sure what broadband speed you need, tap the tasks to find out how quickly you could get them done with our plans.

If you have lots of people in your household, multiple devices connected, or like to game or stream 4K video, you'll probably benefit from faster plans.

Chart data

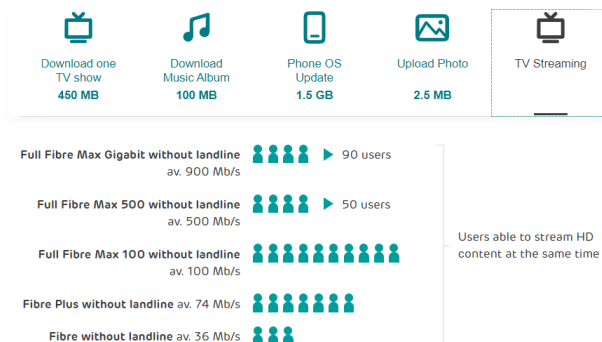


Figure 3 – Pre checkout information

BT

Your package option: Monthly

○ Full Fibre 900 ⓘ
£40.99

This package gives you:

- An estimated download speed of **900 Mbps**
- An estimated upload speed of **110 Mbps**

This package includes:

- Stay Fast Guarantee
- Unlimited monthly broadband usage
- UK and Ireland call centres - you will always speak to one of our team based in the UK & Ireland when you call us
- All ETCs will be personalised including any discounts
- **Xbox Game Pass Ultimate** included at **no extra cost** for 12 months (£10 per month from month 13). To jump straight into the action and experience the incredible Xbox Game Pass Ultimate, once your broadband is up and running, log into MyBT to activate your pass

Monthly prices and one off payments:

- £40.99 a month, then £45.99 from month 25
- £0 activation
- If you are having a new line installed, you will get a free line connection (which is usually £140)
- BT Smart Hub 2 included
- 24 month contract

EE

£0

Added to your first bill

£31

Monthly cost

Your basket

Fibre Plus without landline [Change](#)

24-month plan

Added to your first bill	
FTTP set-up fee	£0
Total to pay on your first bill	£0

Monthly cost	
Fibre Plus without landline	£31
Total pay monthly	£31

Added benefits	
Mobile Data Boost	FREE

The monthly price shown, add-ons and all out of bundle charges will increase on or after 31st March every year by the Consumer Price Index rate of inflation published in January that year, plus 3.9%. See ee.co.uk/increase for details. Please note the cost of other services you take from us may increase or decrease while you're an EE customer.

3 May 2023

Find out more at [bt.com](https://www.bt.com)

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