

Citizens Advice Scotland: Response to Ofcom's consultation on Improving broadband information for customers

Proposal for new guidance to improve customer information

Scotland's Citizens Advice Network provides an essential community service that empowers people in every corner of Scotland by providing free, confidential, and impartial advice through our local Bureaux and national services. We use evidence about people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Background

Citizens Advice Scotland (CAS) welcomes the developments seen in the fixed broadband market over the past few years, with many consumers benefitting from new technologies and increased coverage from faster networks. Likewise, with the rapid deployment of fibre-to-the-premises by various providers throughout the UK consumers now have greater choice of providers and technology. CAS welcomes these developments, as greater competition within the FTTP market will result in greater choice and outcomes for consumers.

However, CAS are concerned that consumers are not fully benefitting from these recent developments. While the pace in which new technologies have been developed and deployed is welcome, CAS believe that consumers are not provided with sufficient information, that is easily accessible, which would allow consumers to make informed choices on the types of broadband technologies.

Question 1

We welcome Ofcom's efforts to understand how consumers perceive and navigate the broadband market and we are concerned by the findings of Ofcom's research and the work of colleagues throughout the industry outlined in sections 2.9 to 2.13 of the consultation. CAS believes that such findings justify the requirement for Ofcom 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
- (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.

CAS agrees that the description of broadband services should be consistent and include an easily accessible description of the underlying technology. CAS agrees with Ofcom's analysis that this would reduce confusion amongst consumers, thus mitigating the potential for consumer harm to occur. We further believe that the adoption of consistent language used to describe the underlying technology by providers would allow for consumers to make more informed choices in relation to their connectivity needs. CAS believes that this would be of significant benefit to both consumers and providers, with consumers benefiting from

increased agency in their decisions and providers benefiting from consumers who are better equipped to engage within the broadband markets.

CAS also agree 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 services. CAS agrees with Ofcom's analysis set out through sections 3.9 to 3.15 of the consultation.

Question 2

CAS agrees with Ofcom's 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. As Ofcom's own research has shown, there is a significant demand from consumers to receive information that allows for greater understanding of the broadband market and gives greater agency to consumers when making purchasing decisions.

CAS further believes that providing such an explanation would require minimal change to providers' point of sales or marketing materials, and we would expect providers to recognise the need for such an explanation. As the broadband market continues to develop, we expect providers to ensure that consumers can easily understand the new technologies and services on offer. Both consumers and industry benefit when consumers have greater agency and information in their purchasing decisions.