Community Fibre

better internet for everyone

Response to Ofcom Consultation on Improving broadband information for customers

May 2023

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Introduction

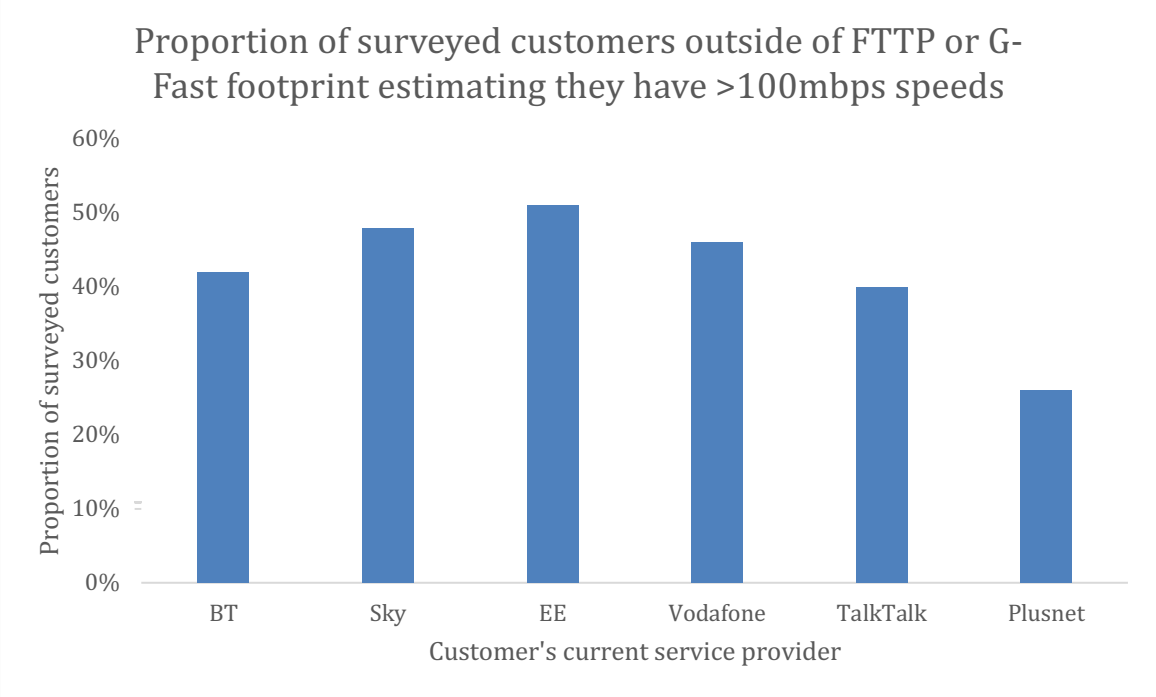
Community Fibre welcomes the opportunity to respond to Ofcom's consultation on improving broadband information for customers. We agree with Ofcom that broadband customers should have enough useful information, at the right time, to help them choose the correct broadband service for their needs. Consumer transparency has been an essential value that Community Fibre endorses since it first launched services in 2013 and continues today as the operator of the largest 100% full fibre network in London.

Our own Research

Last summer (July 2022) Community Fibre commissioned a national-representational market research survey with a sample of 2,855 respondents.

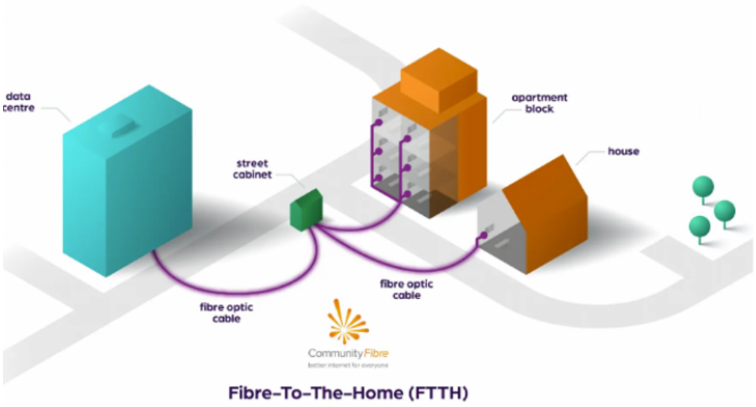
It found that the market has caused consumers to be very confused on technology they were on and the speeds they believe they are getting including:

- Consumers tend to over-estimate their download speeds by 3x their actual download speed.
- Consumers believe their upload speed is similar to their download speed as many have been led to believe they have synchronous fibre like products when they don't, with an average 10x over-estimation of their actual upload speed.
- A large proportion of Openreach xDSL consumers (outside of the Openreach FTTP and G-Fast footprint) believed they had download speeds that were more than 100mbps, despite the maximum download speeds achievable on these lines being ~80mpbs:

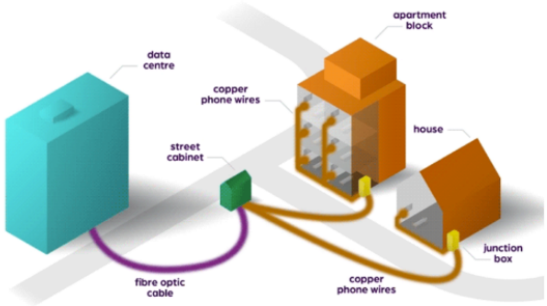


Later last year Community Fibre carried out 29 in-depth qualitative interviews with prospective customers in London spread across a broad demographic. We found that only 2 of the participants understood the difference between Fibre to the Cabinet (FTTC) and Fibre to the Premises (FTTP). Respondents frequently assumed that the VMO2 network was fibre.

In March 2023 we conducted several focus groups in which we continued to find uncertainty amongst many consumers about whether they have ‘full fibre’ or ‘fibre to the cabinet’. For example, one respondent believed that their speed of 67Mbps was the fastest speed available over fibre. During the focus group meetings we explained to participants the difference between FTTB and FTTC using the pictures shown below (which are similar to the ones used by Ofcom in its own research):



Fibre-To-The-Home (FTTH)



Fibre-To-The-Cabinet(FTTC)

Having received this explanation the focus group feedback was that it was now easier for them to understand the benefits of a full fibre service when compared to a non-fibre service.

The conclusion we can draw from our research is that Ofcom's proposals to standardise descriptions for the technologies used will help to provide better information for consumers.

However, there remains significant confusion amongst consumers about the actual speed of their service, especially their upload speed and the reasons why full fibre is beneficial to them compared to non-fibre services. This is a consequence of many years of misuse of the word 'fibre'. This now makes the transition of consumers onto full-fibre networks much harder.

Standardised descriptions are only the first step in a programme of work that must be delivered by industry, Ofcom and the Advertising regulator (ASA) to better explain the benefits of full-fibre connections to consumers.

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Consultation Questions (in blue) with

Community Fibre responses in black

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;

Yes

We agree the guidelines should prohibit the use of the term ‘fibre’ for anything other than FTTP services. To achieve effective consumer clarity we think the proposed guidance should go further. The guidelines should also prescribe the one/two word terms to be used for the other most used technologies. The lack of such guidance runs the risk that operators will continue to use inconsistent terms for their non FTTP technologies and hence consumer confusion will continue. Based on Ofcom’s consultation and research we would propose the following short descriptions:

Short Description	Technology
Copper	For any technology that uses twisted pair copper cables as the final connection into the dwelling that are not capable of delivering Gigabit services; including xDSL and G-Fast technologies.
Gigabit Copper	For where DOCSIS 3.1 based CCTV coaxial cables or Category 5 or 6 data cables (see further discussion in response to part 2 below) are used to make the final connection into the dwelling
Fibre	Where a fibre-optic cable is used to make the end-to-end connection from the Internet into the dwelling
Fixed Wireless	Where a point-to-point radio connection is used to make the final connection into the dwelling
Mobile Wireless	Where a point-to-multi-point radio connection is used to make the final connection into the dwelling.
Satellite	Where a connection from a satellite is used to make the final connection into the dwelling.

Restricting the number of terms used will aid consumer clarity going forward. Giving operators a free hand to define their own terms for non 'fibre' technologies may lead to many different terms being used by different operators and this risks further confusing consumers.

We did consider whether additional terms should be included for different types of copper connection technologies. In this regard we do feel that a differentiation between 'Copper' and 'Gigabit copper' would be helpful to consumers for now. However, with the expectation that all copper cables will be replaced with fibre cables within the next decade (para 3.12 of the consultation) this will increasingly become a legacy issue and the number of terms allowed should be restricted as much as possible to meet the objective of customer clarity.

(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.?

Yes we agree that the terms ‘fibre’ and ‘full-fibre’ should be used to describe fibre-to-the-premises (FTTP) services.

In the proposed guidance we note that FTTB services currently falls into a gap between the FTTC and FTTP definitions. We recommend that FTTB services, which use a copper cable (typically Category 5 or Category 6 twisted pair cables) to make the final connection into the customer’s dwelling should be categorised as ‘Gigabit Copper’ and should be prohibited from using the terms ‘fibre’ or ‘full fibre’.

In para 3.12 of the consultation document Ofcom sets out the characteristics of FTTP that deliver a better customer experience. We have used these characteristics in the table below to compare FTTP with FTTB:

Characteristic	**FTTP**	**FTTB**
Less prone to faults	Uses passive optical connections in the access network with no moving parts or electrical supply and hence fewer points of failure.	Uses active switching equipment within the access network which has moving parts and requires an electrical supply increasing the points of failure.
Can be impacted by bad weather	Exclusive use of fibre optic cables and passive optical splitters in the access network reduces the impact of any water ingress.	Water ingress into the active switching equipment or into the copper data cables used to deliver the service can lead to service detriment and failure.
Impacted by distance from the 'exchange'	Fibre optic cables can carry signals over many km without the need for any intervention to repeat or boost the signal.	Data cables used in an FTTB network are limited to a maximum of 100m from the last piece of active equipment in the access network. Cable lengths above this distance quickly diminish the speed and quality of service available to consumers.
Future proof by supporting faster speeds.	FTTP cables can be upgraded to speeds beyond 1Gbps by replacing the equipment at each end of the connection without having to make any further changes to the cabling.	An FTTB network is limited to providing a maximum speed of 1Gbps over 100m using the installed cabling. Faster speeds would normally require the replacement of the copper data cables with fibre-optic cables.

As such we ask that Ofcom clarify, in its final statement and guidance note, that FTTB solutions are prohibited from using the terms 'fibre' or 'full-fibre'.

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?

Yes. We believe that Ofcom should go further and set out the definitions for the main technologies currently in use as per the table we set-out in our response to question 1(1).

Confidentiality

None of the information included in this response is considered confidential. We therefore grant Ofcom with permission to publish our responses either in part or in full.

About Community Fibre

Community Fibre is future proofing London communities by delivering fibre broadband throughout the capital city. By believing in a more inclusive future where everyone has access to better broadband, Community Fibre offers the fastest fibre broadband in London, with up to 10 Gbps for businesses and up to 3Gbps for consumers, at the most competitive prices on the market. Through offering more reliable and affordable fibre connections, Community Fibre empowers communities, enabling them to connect with friends and family and access crucial services online.

Currently Community Fibre operates across all London boroughs with plans to upgrade 2.2m London properties to full fibre by the end of 2024.

Given our focus on building a network for London our responses will tend to reflect the perspective of more urban consumers although wherever possible we have tried to consider all types of consumer within our responses.