



Openreach's response to Ofcom's "Improving broadband information for customers"

Proposal for new guidance to improve
customer information

02 May 2023

Foreword

On 8 March 2023, Ofcom published its consultation document entitled “Improving broadband information for customers – Proposal for new guidance to improve customer information”.

This response is provided by Openreach Limited - a wholly owned subsidiary of BT Group plc.

We’re Openreach - the UK’s largest wholesale broadband network provider. We build and maintain an open network that is used by more than 690 service providers, so they can offer broadband, phone, and TV packages to homes and businesses all over the UK.

Our network is made up of more than 192 million kilometres of fibre optic cables and copper wires. To maintain and grow a network of this scale requires an exceptional team, and our 25,000 field engineers work around the clock, in all kinds of weather and in every community. Last year they completed 9.8 million engineering jobs, installing and maintaining the equipment that provides fast, reliable broadband to millions of people. Our work often involves liaising closely with local councils, highways agencies, energy suppliers and landowners, to solve complex engineering and logistical problems.

We’re Openreach – We’re the people that make the net work.

Openreach's comments on Ofcom's proposals

Executive summary

- Openreach is proud to offer a range of service to Communications Providers in the UK, aimed at increasing the take up of broadband services, notably achieving our ambitions for the rollout of full fibre service.
- We recognise the importance of consistent terminology, which is echoed in Openreach's own research.
- Openreach fully supports Ofcom's proposals and believes that this is an important first step in helping end customers understand the difference in speed, reliability and service levels that different broadband technologies can provide.
- Openreach would support and welcome Ofcom to continue to work with industry to create further tools to be adopted across the industry to help customers understand 'good, better and best' broadband connections with ease, especially as we move into a full fibre world, and reliability and quality of connection become a more important differentiator versus speed.
- Openreach already provides documentation on its range of broadband access products, including descriptions of the underlying technology. Much of this information for Communications Providers (CPs) is located on our CP Portal website. On this basis Openreach will continue to use the terminology of Fibre to the Cabinet (FTTC) and Fibre to the Premises (FTTP).
- The Ofcom proposed Guidance under General Conditions C1 and C2 which cover point-of-sale information on services available to consumers and contractual information. As such these requirements do not apply to Openreach, however in the interests of consistency of terminology, Openreach is reviewing its documentation and website material to seek to ensure alignment with the proposed Ofcom terminology requirements.
- Ofcom proposes an implementation period of 12 weeks from publication of the final guidance. Given the amount of material that may need to be updated across the industry, this may be a challenging deadline.

Introduction

With over 100 infrastructure providers building the length and breadth of the nation, the great news for consumers and businesses alike is that they will have more choice than ever before – and Openreach is committed to building to 25m properties across the UK with its own plans. We are building as fast as we possibly can – at a rate of over 62,000 premises a week. We believe that is the fastest roll out of full fibre ever seen across Europe.

However, we know that not every broadband network is built equally and that different technologies and build processes can have a huge impact on the speeds that are available to end customers. We are committed to building not only the full fibre future for the majority of the UK as quickly as we can, but also at the highest possible quality.

Also, as we look to migrate end users across from legacy platforms such as part or full copper services, across to full fibre connections, Openreach and industry have an important role to play in demystifying the confusing world of broadband for end consumers to maximise take-up, where speed is no longer the only factor for broadband choice, but reliability and quality of service play an equally important role.

Our research shows that for the first time ever reliability and consistency of connection has overtaken price and speed as the dominating factors when it comes to broadband decision making.

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This challenges the whole industry to think differently about how it markets and compares the many dimensions of broadband differentiation, away from focussing on speed alone.

Openreach therefore supported Ofcom's initiative via the industry working group to develop common standards on clear and consistent terminology for gigabit- capable broadband services. Given the group was unable to come to a consensus position we are now pleased to see that Ofcom has adopted a slightly different approach to meeting the same objective of enabling consistent broadband terminology.

We believe it is important for customers to be reassured that they are selecting their broadband technology and network with confidence, armed with the facts and clarity to help them make the choice between different technology types and infrastructure providers. We therefore fully support Ofcom's ambition to develop a common terminology for broadband services, but appreciate that finding consensus across a complex industry is challenging.

Ofcom’s Proposals

Ofcom is proposing to introduce guidance under existing regulatory requirements to ensure that providers give information on the underlying technology of the broadband connection using consistent terms.

Specifically, Ofcom is proposing that providers should include a short description of the underlying technology of the network delivering the broadband service on their websites and in contract information, using one or two terms such as ‘fibre’, ‘cable’, ‘full fibre’, ‘copper’ or ‘part fibre’.

Providers should use those terms consistently to describe the service, and should only use the terms ‘fibre’ and ‘full fibre’ when referring to FTTP networks.

Openreach fully supports Ofcom’s proposals and believes that this is an important first step in helping end customers understand the difference in speed, reliability and service levels that different broadband technologies can provide.

Timescales

We note that Ofcom has identified this project within its published Plan of Work as follows:

<p>Improving broadband information for customers. We are continuing our work to improve customer understanding of the broadband market and to empower people to make informed decisions about their broadband purchases. We have published proposals to improve consumer information about the underlying technology used to deliver their broadband service, with the aim of issuing a statement later in the year.</p>	<p>Statement Q3 2023–24</p>
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This is expanded in Ofcom’s consultation document which also provides a timescale for implementation as follows:

- Ofcom plans to publish a statement in Autumn 2023
- Ofcom propose an implementation period of 12 weeks from publication of the final guidance (Q4)

Ofcom proposes an implementation period of 12 weeks from publication of the final guidance. Given the amount of material that may need to be updated across the industry, this may be a challenging deadline.

Specific 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
- (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.

Openreach Comments

Openreach does not sell services including broadband services direct to end customers. Rather, Openreach sells network products to Communications Providers (CPs) which provide the access to enable CPs to provide their voice and broadband products to end customers.

We note that Ofcom does not propose changes to GCs C1 (Contract requirements) or C2 (Information publication and transparency requirements) but proposes to publish additional guidance setting out how CPs should describe the broadband services they offer with regard to the underlying technology used to deliver the services and the use of the term fibre.

GCs C1 and C2 do not apply to Openreach.

However we consider that for the purposes of consistency of terminology and to reduce confusion, Openreach will undertake to identify its use of such language and seek to align with the proposal as specified in the Ofcom consultation.

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?

Please provide evidence in support of your view

Openreach Comments

Openreach already provides documentation on its range of broadband access products, including descriptions of the underlying technology. Much of this information for Communications Providers (CPs) is located behind the CP portal. On this basis Openreach will continue to use the terminology of Fibre to the Cabinet (FTTC) and Fibre to the Premises (FTTP).