



toob Limited's Response to Ofcom's Consultation: 'Improving broadband information for customers'

Section 1: Introduction

toob Limited ("toob") welcomes the opportunity to respond to the 'Improving broadband information for customers' Consultation published by Ofcom on 8 March 2023 (the "Consultation").

We appreciate the efforts taken by Ofcom to conduct and undertake research, including the consumer research and as more particularly set out in the Consultation, and note that Ofcom has found, as a result of that research, that providers currently do not describe broadband services in a consistent way, and it is often not clear what network technology is being used to deliver the service¹.

Through listening to and engaging with our customers and prospective customers, and as part of our own research, we have also found that incorrect information on network technology may be given by other providers at point of sale or during the order journey, which we suggest leads to confusion in respect of the product and service consumers believe they are buying (including confusion in respect of the technology that is being sold and the implications that has for network performance, the end-user experience, speed and reliability).

We believe that the proposals set out in the Consultation, once adopted, will aid and clarify consumer understanding of the relevant network technology they will be supplied with by their provider, the different services on offer by different providers/technologies and the features of those technologies.

We therefore fully support Ofcom's proposals as set out in the Consultation, and in particular agree with Ofcom that (i) it is important for customers to have access to consistent terms describing the underlying technologies delivering broadband services, and (ii) the terms 'fibre' and 'full-fibre' should only be used when referring to fibre-to-the-premises ("FTTP") networks (and may not therefore be used for non-FTTP network technology/ies).

Further, while we note that Ofcom has not undertaken any assessment of whether the use of 'fibre' is misleading², we strongly support and encourage the Advertising Standards Authority (ASA) to adopt the Ofcom proposals as set out in the Consultation as they relate to the use of 'fibre' and 'full-fibre' in respect of marketing in relation to FTTP networks only. This should further reinforce consistency of use of terms by communication providers for broadband technology, negate any remaining customer confusion that may arise as a result of marketing of broadband products and services by providers, and allow customers to compare like-with-like products and services.

Finally, with regard to other options considered by Ofcom to help address broadband customer information asymmetry, we do not support introduction of a gigabit-capable labelling scheme to help customers distinguish between different types of broadband product, and agree with Ofcom's position that there would be significant practical issues with the introduction of such a scheme³. We

¹ Paragraph 2.7 of the Consultation

² Paragraph 2.18 of the Consultation

³ Paragraph 3.41 of the Consultation



believe that introduction of such a ‘gigabit-capable’ label/term is likely to lead to further customer confusion (as opposed to reducing such confusion which is the essence of the Consultation).

Section 2: About toob

toob is a full-fibre broadband provider with the goal of making full-fibre broadband accessible to all. toob has been rolling out its full-fibre network across Southampton since 2019, earning a Trustpilot rating of “Excellent”. toob is now deploying its network across more towns in Hampshire and Surrey, and in 2022 also launched its service in Portsmouth by partnering with CityFibre, with the ambition to transform the South of England’s internet experience.

toob offers a consumer and business broadband proposition today that delivers 900Mbps on both download and upload.

For the consumer proposition there are two contract variants each with different pricing. The core offer is an 18 month contract for a price of £25 per month rising to £29 at the end of the contract. Alternatively, a customer can take a monthly rolling contract for £33 per month. The monthly rolling contract has been developed to target the rental market, students living away from home for temporary periods and others that require greater flexibility. Each of these propositions has a £49 installation fee, subject to promotional activity conducted from time to time.

In June 2022 toob launched a business proposition targeted at SoHo and small SME businesses. The business proposition delivers the same speed profile as the consumer proposition but comes with enhanced service levels and the option of a static IP address.

At toob, we want all members of the communities we serve to benefit from all that full-fibre can bring. We firmly believe the deployment of full-fibre networks is an economic and social necessity and the current challenges we are facing only reinforces our view.

Section 3: Response to Consultation Questions

Question	Your response
<p>Question 1: Do you agree with our proposals to issue guidance under GC C2.3, GC C1.3 and GC C1.5 to clarify:</p> <p>(1) that the description of broadband services should be consistent and include a one- or two-word description of the underlying technology; and</p> <p>(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.</p>	<p>Yes. For further detail please see section 1 above.</p>



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 views.

Yes. For further detail please see section 1 above.