

Your response

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>Confidential? – N</p> <p>No. We agree with the principle that the terms used across the industry to describe broadband services should be consistent. However, we do not agree that providers should (1) be required to introduce additional technical terms to describe broadband services or (2) be prohibited from using the term 'fibre' to describe broadband services using fibre technology. We have expanded our reasoning for this below.</p> <p>(1) Introducing new technical terms adds complexity to the market</p> <p>Although we accept that there may be a small sub-set of customers who may not fully understand the current terms used to describe broadband services without supporting information, introducing additional technical terms (e.g. 'part-fibre' and 'copper') will only increase complexity for the majority of customers. This is supported by the BVA BDRC consumer research which indicated a significant number of customers did not understand the additional technical terms being proposed by Ofcom to describe Fibre to the Cabinet (FTTC) and Asymmetric Digital Subscriber Line (ADSL) broadband services.</p> <p>We believe that introducing additional technical terms would be inconsistent with Ofcom's aim to help customers better understand and navigate the broadband market.</p> <p>(2) It is proposed that multiple terms are introduced for the same product</p>

'Fibre' is already a well-established term in the industry which many customers understand to include FTTC and Fibre to the Premises (FTTP). Introducing multiple terms for FTTP ('fibre' and 'full-fibre') and removing the generally understood term of 'fibre' for all fibre technology based broadband services seems inconsistent with Ofcom's aim to create consistency amongst the terms used.

We agree that only FTTP should be referred to across the industry as 'full-fibre', but do not feel that the additional terms suggested, or prohibiting the use of the term 'fibre' for any product using fibre technology, are necessary.

- (3) It would require a substantial amount of resource to update all documents that refer to broadband services

As stated above, the term 'fibre' is widely used across the industry in marketing and contractual material to refer to any broadband service that uses fibre technology.

Requiring an overhaul of this material to remove previous product descriptions (some of which will be for products existing customers are already subscribed to) and introducing new terms, will require significant resource from providers.

For example, changing references from 'fibre' to 'part-fibre' would require updates to a significant amount of customer documentation, including but not limited to: marketing material, website content, the Contract Summary, the Contract Information, terms and conditions, service schedules, customer invoices, any letters sent in reference to the broadband service, etc.

As confirmed in the BVA BDRC consumer research, cost, reliability and speed information are generally the most important factors that customers use to compare broadband services. This information is already clearly set out by providers at the point of sale and in the Contract

	<p>Information and Contract Summary as required under GC C1.3 and C1.5.</p> <p>We consider that Ofcom’s proposal for providers to explain the terms used to describe their broadband services in a way that would be easily accessible would be sufficient to ensure that customers had information about the underlying technology used to deliver their services, without requiring customers to navigate additional unfamiliar and technical terms.</p>
<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?</p> <p>Please provide evidence in support of your views.</p>	<p>Confidential? – N</p> <p>Yes. We consider that requiring providers to explain the terms they use to explain broadband services in a way that can be easily accessed by customers is a more proportionate way to address any confusion experienced by a sub-set of customers, rather than requiring the introduction of additional technical terms, which would result in a more complex broadband market for customers to navigate.</p> <p>Providing an explanation on the terms used to describe broadband services and the underlying technology, on providers’ websites for example, would require far less resource than updating all customer facing materials that make reference to broadband terms (see our non-exhaustive list detailed at question 1), whilst still achieving Ofcom’s aim to help customers navigate the broadband market.</p>

Please complete this form in full and return to broadbandinformation@ofcom.org.uk.