



2 Marylebone Road
London NW1 4DF
t 020 7770 7000
f 020 7770 7600
which.co.uk

Broadband Information Consultation
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Which? response to Ofcom's consultation: Improving broadband information for customers

Which? welcomes the opportunity to respond to Ofcom's consultation to improve broadband customer information. In summary:

- Which? supports the use of consistent terms in broadband consumer information. There is limited consumer value in solely focusing on the underlying technology as part of this information - speed and reliability should also be included.
- Which? agrees that the terms fibre and full fibre should only refer to FTTP services.
- Which? is disappointed that use cases have not been proposed, given the GigaTAG's recommendations.

Which? agrees that the description of broadband services should be consistent. Currently, there are a wide range of terms used to describe different types of broadband connection. This contributes to complexity in the market, making it hard for consumers to navigate and make informed choices about the right product for their needs. Which? research in 2021 found that 4 in 10 (37%) decision makers are not confident in understanding the language and terminology used by broadband providers.¹

Current terminology is creating a barrier between the available technology and consumers matching products to their individual needs. Which? found that 38% of broadband decision makers are put off adopting gigabit-capable broadband as the terminology used to describe different packages makes it difficult to differentiate between them.²

While a description and explanation of the underlying technology can be useful for consumers, not all consumers will be interested in this information. When it comes to gigabit-capable broadband, Which? research found that messaging about speed and reliability was most appealing to consumers.³ This evidence is supported by Ofcom's own research findings.⁴ We are concerned that the current proposal for clear and consistent information focuses too heavily on the technical description as a benefit for consumers. Which? recommends the description of broadband services should include reference to reliability and speed.⁵

¹ Which?, 2021. [Gigabit Take-up Advisory Group: Final Report](#).

² Which?, 2021, [Consumer barriers to adopting gigabit-capable broadband](#).

³ Which?, 2021. [Gigabit capable broadband comms testing research](#).

⁴ Ofcom 2023. [Broadband Terminology Research November 2022](#).

⁵ Which?, 2021. [Gigabit capable broadband comms testing research](#).

Which? agrees that both 'fibre' and 'full fibre' terms should only be used to refer to FTTP services. Today, 'fibre' can be used to describe older FTTC connections, as well as Virgin Media's cable connections. This adds to the complexity in the market for consumers, as they lack transparency about how their service is provided and what they can realistically expect in terms of speed and reliability. The evidence detailed above suggests that this issue of terminology is a significant barrier to consumer adoption of new broadband technologies. Clarity around the use of the word 'fibre' will make it easier for consumers to distinguish between different broadband products, better enabling them to make comparisons.

Ofcom should work closely with the Advertising Standards Authority and the Committee of Advertising Practice to ensure consistent use of 'fibre' and 'full fibre' in the providers' advertisements, not just as part of the customer contract summaries and in detailed contract information.

As per the GigaTAG's recommendations, Which? believes that Ofcom should place a greater emphasis on the opportunities for clear and consistent use cases to build consumer confidence in this market. While some providers may already be utilising use cases, there is no clear evidence of this provided in the consultation, and it is unlikely to be consistent across providers. This lack of consistency may further confuse consumers. Realistic use cases that reflect the performance that the vast majority of consumers should expect from their broadband product could be compelling adoption drivers for consumers and help them identify the right package for their needs. Further research is needed to identify the most helpful use cases for consumers.

It is critical that terminology is addressed as a priority to ensure that consumers can easily identify and differentiate between different broadband services. As such, we welcome Ofcom's work in this area. If the proposed changes do not deliver the desired consumer outcomes, Ofcom should reconsider whether there is any merit in the GigaTAG's recommendation of introducing a labelling scheme.⁶

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

For more information contact: Laura Holdgate, Principal Policy Adviser

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⁶ Which?, 2021. [Using a 'Gigabit-Ready Mark' to help consumers identify gigabit-capable broadband packages](#).and Which?, 2021. [Gigabit Take-up Advisory Group: Final Report](#).