

Consultation response form

Question	Your response
<p>Question 1: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to send customers roaming alerts that include information on roaming charges, mobile bill limits and where to access more information?</p>	<p><i>Is this response confidential? – N</i></p> <p>It is essential that consumers can use their mobile devices with confidence and have access to timely, accurate and clear information regarding roaming charges, bill limits and other protections to avoid ‘bill shock’.</p> <p>It is clear from research undertaken to date (CCNI, July 2023) that the majority of consumers are proactive in seeking out information about roaming charges or taking measures to keep track of their phone usage.</p> <p>So, although most consumers are being responsible, they should not bear all of the burden of seeking to understand and avoid roaming charges. Suppliers must be bound by consistent and coherent rules to ensure that consumers are appropriately informed in relation to roaming charges.</p> <p>ACNI therefore welcomes the proposed new conditions and guidance. The Committee is, however, very aware that consumer benefit depends on the extent and quality of application by Communications Providers, especially where there is flexibility in approach.</p> <p>We ask Ofcom to develop a proportionate and timely monitoring regime which would support optimal application and detect gaps, as well as monitor the impact on consumers to ensure that the benefits of this policy intervention are achieved.</p>
<p>Question 2: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to (a) have and publish measures to enable customers to reduce and/or limit expenditure related to inadvertent roaming while in the UK and (b) provide information on how to avoid inadvertent roaming both in and outside of the UK?</p>	<p><i>Is this response confidential? – N</i></p> <p>- Yes, ACNI agrees with these proposals. The Committee notes that the best way to avoid inadvertent roaming both inside and outside the UK is for UK customers to sign up to a provider that continues to provide a “roam like home” type contract, e.g., O2, Utility Warehouse and Co-op Mobile. We believe that Ofcom should do as much as possible to</p>

highlight this fact, to the extent of providing this information on its website, easily available to all.

Given that it is the case, highlighted in the consultation document, that customers in Northern Ireland are disproportionately affected by roaming, whether inadvertent or not, we would also ask that Ofcom very strongly encourage providers to treat Ireland as if it is in the UK, whether for calls, texts or data, in line with the customers UK contract.

The Committee urges Ofcom to continue to consider best practice around the frequency of alerts given the fact some customers in NI live and work in the border regions where mobile signal strength bounces from one side to the other. Bombarding the same customer with identical messages may diminish their meaning and significance, so triggering an alert, particularly the same alert, isn't always going to be the most effective way to deliver the necessary caution.

In the event of providers being required to 'have and publish' measures to support consumers reduce or limit costs related to inadvertent roaming it will be important for OFCOM to report on the actual uptake of these measures by consumers, per supplier and how each suppliers promotes these measures. It can often be the case through low levels of consumer awareness or proficiency that they are unable to access support measures so reporting on the uptake of such schemes across suppliers is essential

Finally, ACNI wishes to highlight the issue of roaming charges on ferry services between Great Britain and Northern Ireland which share the traits of inadvertent roaming in that consumers can , and do, suffer considerable bill shock without having left the UK. Whilst we accept that Ofcom has limited regulatory powers in this area, and this issue is likely to fall outside the scope of this particular consultation, the Committee urges Ofcom to consider what further soft powers it may use to protect consumer interests in this regard.

Question 3: Do you agree with the proposed implementation period of 6 months from publication of the statement and changes to General Condition C3 and guidance?

Is this response confidential? – N

ACNI believes that the implementation period should be as short as practicably possible, and no longer than 6 months. We also recommend that Ofcom build in a review mechanism, to check the effectiveness of the new measures, 12 months after implementation. Consumer feedback, particularly from Northern Ireland given the particular issues there, will be critical to that process.