

NON CONFIDENTIAL

giffgaff response to Ofcom's consultation on mobile roaming: Strengthening customer protections

28 September 2023

Introduction

We are supportive of the work that Ofcom is doing to understand customers' experiences of roaming and to understand whether customers are adequately protected from potential harms when roaming. We welcome the opportunity to reflect on this and contribute giffgaff Limited's ("giffgaff") views on informing its members about using mobile services when travelling abroad and strengthening their protections. We support Ofcom's proposals that customers should be able to make informed decisions about their roaming use; being made aware of when they are roaming and to have timely, clear and accurate information on roaming charges.

Response to consultation questions

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?

We agree with most of Ofcom's proposals on introducing rules and guidance on customers' roaming alerts and the details that should be included. However, we do not agree with the requirement to offer the option to opt out and back into roaming alerts as we do not believe this is in customers' interest. As evidenced in Ofcom's research, most respondents found it useful to receive roaming alerts and did not often check roaming rates or information before travelling, with only a very small proportion of customers, as noted in paragraph 4.34, preferring not to receive roaming alerts.

We agree with Ofcom that it is important and in customers' interests to receive accurate and clear roaming notifications. We therefore believe it may, in fact, be harmful to allow for an option to opt out of receiving these in the event where a customer forgets to turn these back on for a future trip or may potentially exceed their allowances whilst roaming and incur charges without receiving notification of this. Sending these as a default would appear to be in the customer's best interests.

If Ofcom does proceed with its suggested approach, we also acknowledge the best practice in this area provided in the annex at paragraph A7.33 but to ensure there is consistency across industry in how this should be applied, we would appreciate more clarity on the frequency of how often providers should remind customers about opting back into these alerts and the conditions around 'pausing' alerts, e.g. if the customer should be able to choose the period of time that alerts are paused. All these factors will have an impact on how long it would take to implement an opt in/opt out functionality for roaming alerts.

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?

We agree with Ofcom's proposals here. We have an article on our website on how to stop accidental roaming [here](#), to guide our members on how to stay connected to an EU network and avoid accidental roaming.

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

With the proposals outlined in the consultation we believe a minimum 9-month period would be more suitable for implementation. Our roaming alerts are service messages provided via a third party who we would need to contract, liaise, and work with to amend these in line with the proposals in this consultation (and potentially) add a functionality to opt in and out of, we would therefore require longer than the 6 months suggested.