

OFCOM Consultation: Mobile roaming – Strengthening customer protections

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ICBAN is a local authority-led cross-border development organisation and works for the area known as the Central Border Region between Ireland and Northern Ireland, covering the Council areas of: Armagh City Banbridge and Craigavon, Fermanagh and Omagh, and Mid Ulster in NI, and the County Councils of Cavan, Donegal, Leitrim, Monaghan and Sligo in Republic of Ireland. We welcome this opportunity to respond to a consultation on mobile roaming and how this may impact our border region.

OFCOM in their reporting have stated, *'At the end of June 2022, statutory protections designed specifically to protect customers when roaming fell away.'* It is noted that no clear explanation has been given as to why these 'fell away' or any steps that have been taken to preserve arrangements, which could be preserved within, for instance, the Common Travel Area MOU.

While the Ofcom research for NI shows various means of mitigating the costs of inadvertent roaming, including the use of in-package allowances alerting customers, there is no discussion on how the rights of customers travelling within a Common Travel Area (<https://www.gov.uk/government/publications/common-travel-area-guidance>) can be preserved.

As a body which works to promote the development of the Border counties in both Northern Ireland and Republic of Ireland, we are hereby asking both regulators OFCOM and ComReg, to join forces and use the essence of Common Travel Area MOU to work to readjust the licences of the Mobile Operators that can respect the goals of the Common Travel Area and secure the consumer provisions that have been available until recently. OFCOM's efforts don't allay concerns that overtime the commercial needs of Mobile Operators will re-introduce roaming charges, even though they will be incurring no new costs.

ICBAN, therefore on behalf of its Board of elected members from both jurisdictions, would like to call on OFCOM, and by extension ComReg, to use the Common Travel Area MOU to impose licence conditions on licenced Mobile operators to ban roaming charges between UK and Ireland. There is no reason for consumers rights to 'fall away'. There are no costs reasons to do so. Under the right to reside and the right to work, it is unclear why mobile operators would be given any opportunity to impose roaming costs and thereby give rise to inadvertent roaming that could arise in the border counties that we represent.