Federation of Communication Services (FCS) response to Ofcom consultation: Illegal harms further consultation: Torture and animal cruelty

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. The FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes Ofcom's consultation: Illegal harms further consultation: Torture and animal cruelty and supports the risk-based approach Ofcom is taking.

As most FCS members are Internet Service Providers (ISPs) or resellers, who do not directly generate user-to-user content or provide search services and are, therefore, outside the scope of the legislation, we have not responded to individual consultation questions. However, we do have a couple of overarching points to make.

- 1. It remains important that the regulatory regime is focused on the content and application provider and not the ISP who is providing connectivity solutions.
- 2. As covered in the FCS response to Ofcom's first consultation on Illegal Harm, the FCS encourages Ofcom to continue with its collaborative approach to the introduction of the legislation and to work with industry to build understanding in this area.

The FCS will continue to keep members informed of progress in this important area.