

Retail Voice-only Customers Consultation Team c/o Cat Kelly
Office of Communications
Riverside House
2a Southwark Bridge Road
LONDON
SE1 9HA

January 20, 2021
By e-mail

Dear Cat,

**Reference: Protecting voice-only landline telephone customers (the “Consultation”)
Non-Confidential**

Gamma has made several submissions to Ofcom recently regarding the PSTN closure programme and its potential impact on vulnerable consumers. To that end, we welcome the spirit of BT’s commitment to maintain voice-only services at a price point which reduces the potential for harm.

On the face of it, this promise from BT would seem to include the provision of voice-only service over the top of new fibre-based network access. If that is the case, then it is a welcome extension to the work done in 2018 to safeguard the vulnerable. However, scrutiny of BT’s actual promise reveals a potential significant gap.

This becomes more important if we look at the cost of providing a voice-only service over fibre¹ when compared to that over copper and consider the commercial pressure BT may encounter to exploit any loopholes in their commitment.

BT are promising to²;

2.1.4 Apply the Commitments to all line rental products and services for voice-only customers, including Home Phone Saver, regardless of the technology used to deliver the service, for a 5-year period from 1 April 2021; with the initial price of any products based on new technology being the same as that for existing line rental products at the time;

[Emphasis Added]

It is the inclusion of the reference to “initial price” which gives us cause for concern. The specific fear is that, initially, when take-up of voice-only over fibre is low, the initial price will be (inflation adjusted) £11.99 a month, but, during the 5-year period of these Commitments, BT may interpret the document as affording them the ability to increase, above the rate of inflation, the price for voice-over fibre.

We sincerely hope that this has just arisen through a lazy use of language and that BT’s true intent matches the spirit we have inferred. If so, we would be surprised if BT would not be willing to write to Ofcom making this abundantly clear – if they are not, then it would suggest that Ofcom may have

¹ We note that BT may elect to always provide this using SOTAP, if possible, to avoid this situation.

² Annex 5 of the Consultation.



to exercise some of its statutory powers to safeguard the vulnerable needing voice-only services on fibre-based network access.

As ever, my team and I are at your disposal to discuss issues arising.

Yours sincerely,

David Williams
Commercial Director - Channel