

Emailed to: planofwork@ofcom.org.uk

9 February 2022

Dear Sir/Madam,

Ofcom Proposed Plan of Work 2022/2023

Thank you for the chance to comment on the Ofcom Proposed Plan of Work 2022/2023. We have provided some general comments welcoming the proposed plan of work and a number of specific areas where we hope we can continue to support Ofcom.

General comments

The Covid-19 pandemic has highlighted more than ever the importance for consumers to have access to reliable communications services. As more interactions and activities take place online such as shopping, working, accessing entertainment, information and news, the three overarching priorities which Ofcom has set out – reliable internet, trusted media and living a safer life online – each seem appropriate. We also agree with the seven themes set out for next financial year and we set out some brief comments on three of them below.

Fairness for consumers

The areas raised in the work plan in relation to fairness for consumers are important. We think that the process of switching provider should be as simple and seamless as possible for consumers and we support the implementation of the One-Touch Switch process.

As an ADR provider in the communications sector we regularly receive complaints relating to nuisance calls and scams and we think it is right to raise awareness and provide more information to consumers about what they can do in this area.

We think the work with suppliers to implement the new consumer protections from June 2022 is important and should improve protections for consumers across communications services. We also support the ongoing programmes of work that will review how providers are aligning to other requirements, such as the fairness commitments and the impacts of End-of-Contract Notifications (ECNs). We will continue to support Ofcom where we can in these areas.

Recent events have brought the cost of living sharply into focus, so we think it is right for Ofcom to include ongoing work to monitor and report on affordability issues and the availability, and the promotion and take-up of targeted tariffs designed for customers on low incomes.

Getting everyone connected

We think it is right to have a regulatory focus on the migration to Voice over internet protocol (VoIP). How this is delivered is incredibly important and will need to be done in a way that in particular protects consumers in



vulnerable circumstances and/or those with important products or services that are currently delivered by the traditional fixed telephone network.

Establishing the regulation of online safety

Living a safer life online will mean that there needs to be appropriate transparency and accountability for online services and we would welcome the chance to support Ofcom to look at how a regulatory landscape can build trust and protect consumers against online harms.

Your sincerely,

A handwritten signature in black ink, appearing to read 'Ed Dodman', written in a cursive style.

Ed Dodman
Director of Regulatory Affairs