

Jill Faure  
6th Floor  
Strategy and Market Developments  
Riverside House  
2A Southwark Bridge Road  
London  
SE1 9HA.  
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Dear Ms Faure,

### **The UK Communications Infrastructure Report**

Consumer Focus Scotland welcomes the opportunity to respond to Ofcom's consultation on the implementation of new powers from the Digital Economy Act, which requires Ofcom to produce a three-yearly report on the state of the UK's communications infrastructure. We are not responding in detail to the questions set out in the consultation document. Instead, we would like to take this opportunity to offer some general comments on the issues raised in the consultation and highlight the key issues of relevance to consumers in Scotland.

The new communications infrastructure report will provide UK policymakers with vital information that will inform initiatives, developments and policy responses on a wide range of important issues. However, we strongly believe that this report should not only analyse the communications infrastructure at UK level. It must also provide systematic analysis on every issue that it looks at for each of the constituent nations that make up the UK, including Scotland.

This is important for a number of reasons:

- The devolution settlement in the UK gives the Scottish Government and Scottish Parliament substantial responsibilities and powers to build and enhance social inclusion in Scotland and to support Scottish economic development. It is therefore vital that Scottish policymakers have access to comprehensive, up to date information about the state of the communications infrastructure in Scotland, in order to inform their policy decisions on these fundamental issues.
- Furthermore, policymakers in the Scottish Government, Scottish local authorities, and other Scottish public bodies are increasingly looking at how telecommunications can be used to support the delivery of a wide range of public services, including for example health, education and local government services. These organisations need detailed information about the communications infrastructure that is available to them to support service delivery, and this is also clearly of great interest to consumers of these services. The new infrastructure report offers an ideal opportunity to provide this information.
- Devolution means that many key political, economic, social and cultural decisions affecting people in Scotland are now taking at Holyrood rather than Westminster, and in many policy areas the main focus of political debate for the Scottish public is now the

Scottish Parliament. Telecommunications have a vital role to play in helping to support democracy in Scotland, by providing an expanding range of opportunities for people in Scotland to engage in and keep informed about key political debates and discussions that are taking place. It is therefore important that Scottish policymakers have a clear picture of what the communications infrastructure in Scotland looks like, and how it can be used to help engage people in Scotland in the political process.

- As the consultation document rightly notes, the communications infrastructure in the UK acts as a conduit to support the delivery of an increasing range of products and services. Telecommunications underpin many of the activities that consumers might undertake when dealing with business. For example, consumers need telecoms services in order to find the best deal for a particular service or product; to pay suppliers for accessing these goods and services; to find out new information about a particular product; or to provide feedback or make a complaint about a service that they have used. Therefore if consumers do not have access to effective telecommunications services then this can lead to them suffering detriment in many other areas of their lives. However, the development of the communications infrastructure in the UK to date has shown that remote rural areas tend to be the areas where the market is the slowest to develop, and people living in these areas are in greatest danger of missing out on the benefits that new technologies can bring. This is a particularly important issue in Scotland which has a large number of rural, remote and island communities. It is therefore essential that the new communications infrastructure report breaks down the information that it provides to identify local areas where there are particular difficulties or limitations in the infrastructure, and consider how these can be addressed.

Finally, on a more general note we would urge Ofcom to ensure that the communications infrastructure report is produced and disseminated in such a way that it can be easily accessed, used and understood by local communities and individuals, as well as by policymakers and industry. Taking this approach would help consumers and communities to understand what the communications infrastructure looks like in their own local area, and to fully engage in, and potentially even lead, debates and initiatives to help improve this infrastructure in the future.

I hope that the points made in this submission are helpful. If you wish to discuss any aspect of this submission further then please do not hesitate to contact my colleague Douglas White, Senior Policy Advocate at Consumer Focus Scotland, on [douglas.white@consumer.org.uk](mailto:douglas.white@consumer.org.uk) or 0141 226 5261.

Yours sincerely,



Sarah O'Neill  
Head of Policy