

ACOD response to the Draft Annual Ofcom plan 2009-10

1. ACOD welcomes the opportunity to respond to the draft Ofcom Annual plan for 2009-10 and appreciates the efforts of the Annual Planning team in coming and talking to the Committee about the proposed priorities for the year.
2. The Committee explored its own priorities at an extended strategy meeting at the end of the Summer and we also took the opportunity to engage with members of the Ofcom National Advisory Committee's in the Autumn.
3. As a result of these sessions, we believe that the existing priorities and strategic framework proposed by Ofcom remain the right ones. However, we are also keen to ensure that the interests of Older and Disabled People continue to feature throughout this work. We think this is particularly true in terms of issues such as Access & Inclusion, Media Literacy, PSB and Consumer Protection.
4. We are pleased to see that these areas continue to be of importance to Ofcom, and we are encouraged by the importance the new Ofcom Chair has attached to supporting these groups.
5. This is particularly important during times of economic difficulty. Therefore, whilst we recognise the need to reduce the regulatory burden on businesses – particular in the current economic climate– we are keen to ensure that minority groups continued to be well served by both businesses and the regulator, and that a reduced regulatory burden does not result in reduced services for older and disabled people.

6. Competition and the market do not always cater effectively for minority groups, especially if those groups have lower incomes than some other sections of society. However, despite this it is important that their needs continue to be met.

7. Many specialist services only reach small audiences, but they remain of value to users and society as a whole. ACOD would therefore urge Ofcom to ensure that where the regulatory burdens are reduced, this is not at the expense of services for older and disabled people. We would encourage Ofcom to seek suitable – and binding - assurances where appropriate to ensure that this does not happen.

8. ACOD has continually argued that USO should be widened to include broadband, stressing the potential importance of this for Older and Disabled people. We therefore are encouraged by Ofcom’s work in developing next generation access and networks, as well as some of the ideas mooted in the first draft of Digital Britain. We will continue to watch these developments with interest and believe that they may play a key role in defining a future Ofcom strategic framework.

9. Finally, we would also reiterate points we have made in the past around both the employment and portrayal of Older and Disabled people. This continues to be of importance to the Committee and will be another area where we will continue to closely monitor the work of Ofcom and industry.

Thank you for the opportunity to respond to the consultation.

Mike Whitlam CBE

Chair ACOD