

**Title:**

Mr

**Forename:**

Paul

**Surname:**

Carter

**Representing:**

Self

**Organisation (if applicable):**

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1.1: What are the implications of market change for mobile and wireless services?:**

Appropriate market changes could allow much wider use of mobile voice and data services. Current prices are way too high, especially for data

**Question 1.2: How are citizens and consumers affected by developments in the mobile sector?:**

Citizens and consumers are currently ripped off by mobile operators charging far more for data than for voice services. This impedes development of internet use,

especially in rural areas poorly served by fixed lines

Texting charges are far too high.

Lack of compulsory mast sharing means coverage is patchy for all

**Question 1.3: What are the purposes of mobile regulation, and where should its focus lie?:**

Mobile regulation should do two things:

Promote maximum data use over mobile networks by forcing down internet access charges

Force all charges down substantially by promoting ease of new competition by encouraging new entrants

**Question 1.4: What is the scope for deregulation, competition and innovation in the mobile sector?:**

None while we have an effective oligopoly

Ofcom needs to do the following

Ban all termination charges for fixed line and mobile networks. Operators should charge only their own subscribers. This leads to a system that favours new entrants by promoting competition

Ban the promotion/subsidisation of new handsets by bundled offers. There should be transparent pricing of contracts and handsets. Prices of handsets would thus drop rapidly from current unrealistic levels in the UK.

Compel mobile operators and all fixed line operators including cable to publish wholesale prices that are realistic and offer these to any new entrants who wish to piggyback on their networks thus increasing competition. If prices do not fall fast enough (as is currently the case with BT), Ofcom should force the breakup of all operators into two entities, one for transmission and network and the other for consumer contracts at the same time as forbidding the simultaneous carrying out of both functions

Any form of roaming charge should be banned where both home and away locations are operated by the same worldwide 51% group. Why should Vodafone charge for roaming between different country networks it operates for example?

In combination with the above, HM Government should itself invest in a 50 Meg or higher speed broadband network accessible by every household in the country. The cost of this is trivial in national terms, but essential to future global competitiveness.

**Question 3.1: What do you think are the features of a well-functioning mobile market? What evidence do you see that those features are present in the UK market?:**

Segregation of network and consumer contract business

Complete lack of cross subsidisation to achieve transparency

Absences of termination fees. Operators should only bill their consumers.

I see no evidence that operators are doing this, or that Ofcom is meeting its obligations by requiring this

**Question 3.2: What measures are most appropriate to assess whether the mobile sector is performing well for citizens and consumers?:**

Much greater competition

Much lower prices

Data charged at much lower rates to promote use - why are texts so much more expensive than an equivalent voice call?

**Question 3.3: How will market dynamics change as a result of trends such as availability of new spectrum, mobile broadband and new ways of delivering voice services?:**

They won't unless Ofcom regulates to ensure much more competition and forces consumer prices lower

**Question 4.1: What is your experience, as an individual consumer or an organisation that uses mobile services?:**

Mobile services are far too expensive

Handset prices in the UK are artificially high due to cross subsidisation

Data charges are a scandal

**Question 4.2: How should regulators and policy-makers respond to signs of rising consumer concern? :**

Regulate more and force mobile operators to increase competition and reduce charges

**Question 4.3: What are the important factors to consider in striking a balance between protecting mobile consumers and enabling markets to work flexibly? Have we got this balance right in today's mobile market?:**

There is only one balance - for the consumer and against the current oligopoly

**Question 5.1: How does the use of mobile services affect our participation as citizens in society?:**

It makes poor people less likely to contribute due to very high costs of access. Particularly important in rural areas where mobile broadband could allow better broadband if the price were right

**Question 5.2: What factors should we take into account in thinking about access and inclusion issues in mobile markets?:**

Low prices and competition - something which the current set up fails to meet

**Question 5.3: What factors should we take into account in thinking about new services, and how those services may affect issues like protection of children, privacy and security?:**

**Question 5.4: Have you been affected by issues about coverage or 'not spots'? How has it affected you?:**

I find I often have coverage problems in major lowland areas.

If mobile operators will not cover upland areas the Government should do so funded by levies

Mobile companies should be compelled to cover all areas below 500 metres without exception

Compulsory mast sharing would make the whole system more efficient

**Question 7.1: What do you see as the most influential trends and features of mobile and wireless markets in future?:**

I see little future for improvement without massive regulation and intervention to encourage competition

**Question 7.2: What new policy and regulatory challenges could the trends identified in this section bring? Which policy and regulatory challenges could they address?:**

See above

**Question 8.1: Should Ofcom do more to promote competition in mobile and wireless markets?:**

See above

**Question 8.2: Ofcom's strategy in telecommunications is to promote competition at the deepest level of infrastructure that is effective and sustainable. How might this strategy be applied, given future developments in the mobile sector? Under what circumstances, if ever, would it make sense to consider access regulation for mobile platforms?:**

Ofcom's strategy should be to do a lot more than it has failed to do for the last twenty years. See above

**Question 8.3: What role can competition play in ensuring that future development of the mobile internet provides an open and flexible environment for a wide range of services? Should Ofcom explore open access requirements to ensure opportunities for innovation? What role might 'net neutrality' play in the mobile sector?:**

The main point of competition is to decrease prices and increase access and data use. See above

**Question 8.4: What role might competition play in addressing questions about transparency of prices, services and contractual conditions offered to consumers of mobile and wireless services? What role should regulation play in addressing these questions?:**

A much larger role See above

**Question 8.5: What is the best way to promote content standards and ensure privacy protection for increasingly complex content and transaction services? How will privacy issues fare in a world where services are more personal and more complex?:**

Privacy should be the last thing Ofcom considers until we have a functioning competitive market

**Question 8.6: Will the mobile termination rate regime need to evolve or change more fundamentally? What is the best approach to adopt?:**

All termination rates for mobile or fixed networks should be nil - see above

**Question 8.7: If competition does not reduce international roaming charges sufficiently, how should regulators respond, if at all?:**

Aggressive intervention such as price prescription and banning of termination charges

**Question 8.8: How might universal service and universal access need to adapt in a world where we increasingly rely on mobile services? What role might mobile play in universal access delivery in future?:**

Segregate network and consumer contract business by law to ensure transparency

**Question 8.9: Can markets and commercial agreements address issues such as ?not spots? and emergency access?If not, what role might be played by a regulator to address these issues?:**

No

Government to deal with access by investing in networks, masts etc by a levy on operators

**Question 8.10: How might access for particular groups (such as the elderly and disabled users) need to evolve in future? What role can competition play in addressing these questions?:**

**Question 8.11: Do you have any comments regarding our proposed way forward and the objectives of the next phase of this Assessment?:**

**Additional comments:**

This is a mature market and aggressive regulation is required to ensure economic competitiveness and fairness to consumers