

Title:

Mr

Forename:

Chris

Surname:

Challis

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?:

Greater profits for operators, lower tariffs and greater coverage for users.

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

They are directly affected. The mobile phone is ubiquitous and considered an essential item for nearly everyone in the current generation.

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

To stop consumers from becoming prey to monopolisation, unfair tactics and operator greed. Focus should lie on protecting the consumer, while also upholding the industry's point of view.

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

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?:

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

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?:

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

Consumer, tester of mobile devices and mobile device software.

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

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?:

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

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

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 do have coverage issues in the countryside, and regular dropped data connections in urban and rural areas.

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

Greater bandwidth driven by adoption of video (calls and recreation), greater camera specifications, music, digital storage, mobile payment options.

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?:

Complexity of billing will increase, and should be made easier to understand and not harder. This general layer of confusion is very beneficial to the operators and detrimental to the consumer.

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

Competition is currently good, with at least 4 major operators working in the UK, with a number of virtual operators existing alongside them. That MVNOs can even exist at all shows a healthy level of competition.

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?:

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?:

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?:

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?:

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

It must not implement termination rates. This is deeply unpopular, certainly in the UK. In the US it is accepted as part of the antiquated network and billing systems, but in the US it is not permitted to cold call a sales pitch to a mobile number.

Termination rates represent a stealthy way of taking money from a consumer. As consumers we are ingrained with the idea that if we initiate something, then we pay for it. The idea that someone else can force us to pay money for a potentially unwanted service is abhorrent to most people.

Termination rates also allow a financial attack on a person, by spamming with text messages or calls in order to increase the amount the receiver has to pay.

A common analogy is the Royal Mail. I write a letter, buy a stamp and post it. I expect it to reach the given address. As the receiver, I absolutely do not expect to have to pay for the letter, especially as I do not know what it contains.

They also allow an operator to lower the monthly tariff, but gain extra revenue over and above the tariff drop, in effect costing the user more money. If tariff rates remain the same, the operators have just opened a new revenue stream and the consumer is left even more out of pocket.

Personally I would be very upset if I had to pay to receive a 10 minute "pocket dial" where someone accidentally initiates a call to my phone.

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

Sternly worded letters and a game of paper-scissors-stone.

Well, not really but they could at least cap the roaming charges, investigate the actual difference between networks, possibly approach the European Union regarding roaming charges across Europe.

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?:

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?:

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?:

They could set up specific subsidised tariffs to OAPs, although I believe they would prefer it if they just bought PAYG phones as the minutes expire.

Certainly tariffs should be clarified so that those with assistive needs can be better placed to make a decision about what they want.

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

Basically, no termination rate. I simply do not feel that I should pay for calls that I do not initiate.

Additional comments: