Title:

Mr

Forename:

Chris

Surname:

Newby-Robson

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?:

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

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

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?:

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?:

I think Ofcom is excessively biassed toward industry and not enough of a consumer champion. A good example of this is the level of Roaming charges.Irrespective of whether the call is terminated on another member company of the same group or on a separate company I cannot see why the costs of transiting two network are worth 4-6 times than the cost of an intra network call. If their real costs are this high then they need to have the breath of competition down their necks as I cannot see any justification for call charges as they are now. Further if in bundle call charges are economic to provide at 10 pence per minutes (which is what most networks impute the cost of the bundled minutes, then charging 35 pence per minute of more for trans network calls out of bundle is truly excessive. The industry market model that has evolved seems to reward these operators for charging each other for termination, when they do not really pay the cost themselves they pass it straight through to the consumer. As all the companies do it it has effectively become a cartel with excessively restrictive practices due to the high cost of entry.

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

Use of mobiles liberates people from the fixed landline and allows a much more mobile workforce and more flexible working practices. It allows better use of leisure time.

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

I note since I just bought a data card for myself that the vetting procedure seems excessively cautious. I walked into an Orange shop as an existing customer of good standing with an account that has been in existence for seven years. Despite this I had to undergo the residency test that involved providing a lot of personal and personal financial details to a member of staff in an open shop full of customers. This was followed up by the actual account creation which understand also involved a credit reference search as well. Apparently this is standard for all customers seeking to take out a fresh contract even if they are existing customers. I suppose that this is good as it ensures that my identity is not being stolen, however the shop staff member told me that out of ten applicants every day only two passed this vetting procedure. Therefore consideration needs to be made as to how these measures could be less onerous without compromising any security but with the effect of excluding less applicants.

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?:

Normally I have just been irritated when I was not able to gain reception with my mobile phone. I can envisage circumstances where as the public call boxes are removed when the access to a mobile phone signal could become a life and death issue. I would welcome independent research into coverage and publication of the results so that operators could be shamed into improving it.

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

Convergence between voice, data, and media as every thing is digital IE data. The ability to access data sources at reasonable cost. Presently the data charges seem to me to totally disproportionate to the cost of voice calls. If the mobile operators want to make their data services compete with land-line internet access we need to see monthly data allowances raised by an order of at least ten times for the present cost.

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?:

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

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?:

I am utterly against termination charging for the receiving party. I cannot know in advance who is calling me and if I started to be charged for incoming calls then I would simply bar all incoming calls except for my family circle. This would I am fairly certain, crucify call volumes and actually harm the industry significantly.

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

Yes the regulators will need to be firm but fair. See above - I am of the opinion that roaming charges are excessive and that if call volumes are reasonably even then there should be no need to charge termination charges whatsoever. This could lead to the complete eradication of all termination charges roaming or other wise proposed.

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?:

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: