

**Title:**

Mr

**Forename:**

Tony

**Surname:**

Shipley

**Representing:**

Organisation

**Organisation (if applicable):**

PhoneAbility

**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?:**

n/a

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

n/a

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

n/a

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

n/a

**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?:**

n/a

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

n/a

**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?:**

n/a

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

n/a

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

n/a

**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?:**

n/a

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

n/a

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

n/a

**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?:**

n/a

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

n/a

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

n/a

**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?:**

n/a

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

n/a

**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?:**

n/a

**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?:**

n/a

**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?:**

n/a

**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?:**

n/a

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

n/a

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

n/a

**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?:**

See Additional Comments.

**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?:**

n/a

**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?:**

See Additional Comments

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

n/a

**Additional comments:**

PhoneAbility is not submitting a formal response to this consultation.

We will be offering comments in connection with the Commission's Communication on the Scope of Universal Service. We believe that an extension of the principles of universal service and users' rights is the key to many of the regulatory issues raised in this consultation, and therefore a common position on the European framework for this is essential to development of the debate on these points.

As a side issue, we suggest that more in depth analysis of the ownership and use of mobile terminals by older (and elderly) and disabled people would be helpful. The suggestion that these groups are excluded from mobile services runs contrary to experience, and it may be that they make as much use of them as they need or wish. There is an issue over the suitability of terminals but this is excluded from the regulatory scene.