Title:

Mr

Forename:

Paul

Surname:

Stockwell

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?:

We are seeing an increasing reliance on Mobile & Wireless we should see a reduction in call costs as has already been seen on fixed line services.

Data costs are still much too high for data usage to take off in the UK. Many pho0ne users would use mobile internet more if the cost per byte came down. Business users often want mainly voice with occaisional data, not entirely separate packages with additional 'line rental'

There is a need still for higher bandwidth mobile data products to support new mobile applications. GPRS is still too limited and 3G has limited coverage & higher costs. This should be designed to support FMUs - Fast Moving Users rather than those visiting other offices or moving at walking pace.

Data used costs should be instantly available to account holders, particularly small businesses & SMEs where costs have to be tightly controlled. A 'data meter' should be a requirement on every package giving amount of data used and the current cost.

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

Often they are left with a bewildering array of tariffs, contracts and options that seem to be designed to confuse. It makes like-for-like comparisons of packages almost impossible for experts, Let alone ordinary customers. These should be simpified and limitations placed on the numbers of these and the rate at which they can be changed or replaced.

There should also be a guarantee system in place to protect consumers when a reseller goes out of business. If they want to offer money back and money off deals then they should have to post a bond to ensure that these can be paid in the event they cease trading for any reason.

Exceeding a monthly data target or allowed number of minutes or texts is also an issue for users on limited budgets. Better tools to manage these should be provided. It is not beyond the networks to provide this information to users in the form of a meter, total used time etc. After all if they were unable to measure these they would be unable to produce a bill! This information should be accessible to the user from their phone.
It is still possible to get caught out with high call costs when making mobile to mobile calls outside ones own network. This is unavoidable as number portability has meant that it is no longer possible to identify the network provider from the STD code alone. These charges should be standardised with agreement on the internetwork access charges between all the UK networks and ideally Europe.

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

Now we have essentially a mature market with just about everyone who needs one having access to a mobile phone the target should be to ensure customer protection and reasonable usage costs to the end users

Charging for receiving calls has never been done in the UK , before except perhaps line rental might be considered to fill this purpose. It should not be introduced now. For example if a child is out with their Pay-as-you-go phoine and it is out of credit they should still be able to receive calls from their parents. Consideration should be given to the definition of emergency numbers for juvenile phones also perhaps including a user-defined emergency number for reaching their parents when out of credit?

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

It is difficult to see how this can be rolled back much further, indeed there are arguments for saying it has gone too far.

Regulation needs to concentrate on consumers rights and costs now more than technology for existing platforms.

Consideration should be given to making the process for developing and introducing new technologies easier and quicker to allow the UK with a significant legacy infrastructure to keep up with developments in less burdened 'new economies' A regulation strategy to encourage new technologies and to approve them quicker and less expensively should be considered.

Commercial protection of existing interests either directly or by restricting new technology absolutely should not be a option. The major operators all have well paid, and presumably capable leaders who can chart their course through these situations, if their strategies fail then they pay the penalty and that is what happens in business and it is a matter between their management and their shareholders. Ofcom's job should be to deliver a spectrum and a marketplace that delivers maximum benefits to the UK and the risk of death of sacred cows should not deter or affect Ofcom, or any other public sector body from achieving this goal.

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?:

That a good range of relevant services are available to the public at a reasonable price.

That the contracts and tariffs offered are comprehensible to the end users and easily comparable.

On the plus side a number of products and services are available but the tariffs are overly complex and designed to confuse.

Mobile data is availabe but at an artificially high price. There is a need for a voice tariff that supports occaisional data use for users that only occaisionally travel 'out of the office' (or home!) and need internet access.

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?:

If I knew that I would invest in it not reveal it here :-)

True mobile internet has in my opinion yet to arrive and may require new technologies. Certainly the price of data needs to come down.

Forthcoming developments in areas like personal cellular microsites and handsets that automaticall select the lowest cost carrier - e.g defaulting to landlines when at home will reduce costs. This is practical convergence when you can be assured of being able to make the call using a consistent user interface and leave the routing details to the system.

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

I am interested in mobiel data for vehicles and this still needs a product that works. Rail will be easier to arrange as trains do travel predicted routes at (mostly!) predictable times.

There is a need for an interactive road traffic information service that efficiently serves motorists in order to make the best use of the travel networks we have and mobile technology will be needed to supply this.

Constant development in transport technology means increasing use of the radio spectrum for voice, data and radar applications over the short, medium and long ranges. Ofcom needs to evolve to understand this area and the needs of UK transport as this is where developments will focus giving UK users the sort of services on the move they are have become acustomed to in the home and the office.

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

quickly and effectvely

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?:

Always consider the end users view. Particularly the 'unskilled user' who doesn't know or care how a mobile product works but wants to be able to make phone calls at a sensible price. In the end these are the people we are all working for not the lobbyists, network operators etc. Even Ofcom's political masters will have to answer to them.

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

Increasingly it is the norm to be able to call anybody from anywhere and to know if you have a problem you can phone sombody, pretty well wherever you are. This has already changed society in significant ways and this process will only accelerate.

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

Increasingly exclusion from these services will adversely impact on people. Already for unemployed people seeking work access to the internet and being able to be reached by phone is as important as electricity, gas, water and transport. Analogies can be made for many other groups. Many disabled or ill people can cope at home now because of these technologies who previously would have had to be in care or in hospital.

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?:

Mainly by sporadic mobile coverage when travelling at speed in a vehicle. This issue has frequently suffered from enthusiatic 'airbrushing' and now that coverage in urban areas are improving more focus is needed here. Particularly for key services and I would include freight transport in this, particularly since the advent of 'just in time' stock control.

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

A high bandwith 'last mile' wireless technology to link homes & businesses with available optical fibre without having to dig up the streets

Longer range wireless data services allowing true mobiel access to the internet.

An effective telematics system that allows dynamic route planning for vehicle travellers and allows for better management of traffic.

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?:

Policies for mobile data need to be made with greater consultation between transport regulators and spectrum regulators and better exchange of information between the transport industry (vehicle manufatcurers, bus & haulage & rail operators, DfT, HA) and the telecomms industry (Ofcom, Handset makers, network operators and mobile computer builders)

Understanding these industries and their needs will be as important as understanding the radio & telecommunications industry is now.

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?:

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

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?:

Some of these areas will not be commercially attractive. This is when a regulator may have to step in to ensure a service is provided. Ofcom may have to do its own drive tests, or take powers to ensure it sees all the results of these.

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?:

Again the problem with competition is that if there is small demand there will be a small response.

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: