

## Communications Consumer Panel and ACOD's response to the Department for Science, Innovation and Technology on Improving Broadband for Very Hard to Reach Areas

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### About us

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the voice of UK consumers, citizens and micro-businesses is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular, people who may be in a more vulnerable position in society. We commission research, provide advice and encourage Ofcom, governments, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro-businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales, respectively. They consult with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Our response

We welcome the opportunity to contribute to the Department for Science, Innovation and Technology's (DSIT) consultation on improving broadband in very hard to reach areas, having previously contributed to DCMS' call for evidence in 2021<sup>1</sup>.

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<sup>1</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-dcms-call-for-evidence-on-improving-connectivity-for-very-hard-to-reach-premises.pdf>

We strongly agree that interventions are required for very hard to reach premises and that alternative approaches are required. The consumer, citizen, micro-business (broadband consumer) journey towards reliable, fast broadband is currently inconsistent and for some, frustrating, disappointing and costly (both in terms of time and money). Broadband consumers who wish to receive an improved service, or get connected for the first time, have a lot of work to do in finding out how to make this happen.

Rural consumers, citizens and micro-businesses need connectivity that enables them to use multiple applications at the same time, for example - a family farming for work, while also studying and taking part in leisure activities; or a rural hotel, with guests that assume it to have a reliable network connection. At the same time, digital connectivity is needed as an alternative to some public (health) services, with virtual GPs or hospital appointments an enormous asset to these communities at times where inclement weather and travel disruption would make attending an appointment on time impossible.

We would reiterate what we said in 2021, that connectivity not only encompasses access to infrastructure but also a consumer's ability to access services confidently, engage online safely, and take advantage of the financial, educational and social advantages of being online and we hope that responses to this and the DSIT consultation on the review of the broadband USO will be read by both DSIT teams.

The Panel has always taken a technology-neutral approach to connectivity, not focusing on one type of technology to serve all. The challenges in serving people and businesses in remote rural areas are different to those of delivering the same service to people and businesses in built-up areas. We have welcomed interventions such as the Shared Rural Network (SRN), to support the broadband USO and commercial broadband rollouts in helping to get people connected and have been disappointed that the promises of the SRN have not yet been delivered to rural and remote communities. We welcome DSIT's focus on improving digital connectivity in areas where a competitive market does not exist, to the detriment of those living, working and studying there - particularly those without the digital skills and confidence, or finances, to look into more advanced technological solutions themselves.

We urge that connectivity initiatives be designed inclusively and with the aim of connecting harder to-reach consumers, citizens and micro businesses first.

We are concerned that broadband and landline providers may rely on consumers having access to better mobile connectivity than they have, and we have previously flagged that 2G and 3G networks remain important to consumers who cannot access a reliable 4G or 5G connection.

We have been working closely with Ofcom policy teams responsible for stewarding industry's retirement of these technologies. In addition, many consumers rely on 2G connectivity for a wide range of uses including telecare units, smart meters and making emergency calls in rural areas. Migration of analogue landlines to all-IP networks is a front of mind concern to us, particularly in rural and remote areas, and one that we have highlighted to a list of MPs, including the Government's Rural Connectivity Champion, Simon Fell MP.

We are concerned that consumers in very hard to reach areas only have access from one service provider for digital connectivity, a single point of failure, which prohibits unfettered access to a competitive market, drives up consumers' costs and promotes behavioural disengagement. In the cost-of-living crisis, we have seen smaller digital connectivity providers go bust, leaving their customers adrift. Having raised this with Ofcom, we know that there is a contingency for this situation, but it is clear that this is not widely known by consumers in very hard to reach areas.

### **Engagement with our UK consumer stakeholders about rural connectivity**

The Panel runs regular consumer stakeholder roundtables across each of the UK Nations, to capture the consumer voice in the communications sector ('National Hubs'<sup>2</sup>). A wide range of consumer, citizen and micro business-related organisations engage with us, including those representing farming and rural communities, older people, young people, racial equality, mental health, carers, disabled people, and many intersections of the above. The Hubs have continued to run, as interactive webinars, as opposed to the in-person, roundtable format - throughout the pandemic and beyond - and are an opportunity to share insights, including the Panel's independent research.

Our research with participants living in rural and remote areas revealed that those living and working in places that are very hard to reach are still getting an unfair deal in digital connectivity, compared to the rest of the UK. We would highlight the following:

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<sup>2</sup> <https://www.communicationsconsumerpanel.org.uk/what-the-panel-does/what-the-panel-does>

- A summary note of the meeting we hosted this summer to share our rural research and a list of participants, overall reactions to the research from these stakeholders, and related research that they shared with us and each other, which can be found on our website and is provided here for convenience [National Hub meeting on digital connectivity in rural and remote areas](#)<sup>3</sup>.
- We have published our independent research, our executive summary containing the highlights of the research and our recommendations, alongside a video showreel of case studies and shorter clips, illustrating the barriers and workarounds people in remote and rural areas face to reach a fair level of digital connectivity. This is also published on our website: [Struggle for Fairness \(CCP, Futuresight, 2023\)](#)<sup>4</sup>

Investment and innovation should be encouraged so that the whole of the UK can receive a boost in digital connectivity, so that these communities can attract the younger generation to return or stay and build businesses and families there.

We understand as the consumer voice to the Digital Connectivity Forum, formerly the Broadband Stakeholder Group, that digital connectivity providers require more support to overcome barriers to accessing some parts of the UK where there is demand. We support DSIT's aims to seek to understand and address barriers faced by providers of digital connectivity and enable the possibility of new entrants to the market, providing consumers in very hard to reach areas with a competitive market where one hasn't existed before. We welcome DSIT's analysis of responses to the call for evidence and its proposed relaxation of speed requirements to enable more providers to deliver connectivity in these areas.

Some of the participants in our previously-highlighted rural research (including those who live in or near National Parks) spoke of the need, in their opinion, for more collaboration between government departments and others with the power to make a change to assist them.

One participant highlighted the benefits of having studied in an area with better connectivity and many of the participants across the overall sample (noting that it was a small sample size, due to this being a qualitative study) used words and phrases such as "life-changing" when describing the impact of improved digital connectivity.

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<sup>3</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-stakeholder-hubs-summary-june.july-2023.docx>

<sup>4</sup> <https://www.communicationsconsumerpanel.org.uk/research-and-reports/the-struggle-for-fairness-the-communications-issues-facing-people-living-in-rural-areas-2023>

Many of the participants in our study were receiving unreliable digital connectivity and speeds that were lower than those quoted in the DSIT consultation document, where responses to the call for evidence are referenced. Participants included micro-business owners, who were having to live with multiple workarounds, from relying on their landline as mobile connectivity was unreliable, struggling with two-factor authentication for the same reason and working anti-social hours as that's when the broadband worked, with one micro-business owner who provided catering services describing digital connectivity as, as important a facility to her customers as a working toilet. One participant said that with better broadband connectivity, he would be able to give up his landline. Better for this group of consumers meant a service they could rely on, to be protected from outages and to have good broadband speeds. Gigabit speeds would appear to be a faraway hope for some of these consumers.

### **Summary**

In summary, we would urge for there to be more realistic speeds, enabling more competition; removal of barriers to access; reliability of connectivity so that promised speeds meet the needs of those paying for the service; and resilience from outages, as a substantially improved digital connectivity journey for consumers, citizens and micro-businesses in very hard to reach areas.

We strongly advise DSIT to work closely with stakeholders representing consumers, citizens and micro-businesses in these areas to understand and monitor their experience and to understand what communication mechanisms are needed for consumers, citizens and micro-businesses to understand how to access improved digital connectivity.