

## Communications Consumer Panel and ACOD comments on a consultation on processes for switching fixed voice and broadband providers on the KCOM copper network

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### Introduction

The Communications Consumer Panel and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to comment on this consultation on processes for switching fixed voice and broadband providers on the KCOM copper network.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, government, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses. 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. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise 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.

There is also cross-membership with Ofcom's Advisory Committee on Older and Disabled People (ACOD). This means that Members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.

### Response

The Panel believes the current regime has not, for some time, been sustainable and has long called for the process of switching Communication Providers (CPs) to become easier for consumers and small businesses. Low switching levels lead to reduced competition and a worse deal for consumers across the board. If consumers are more aware of the benefits of switching, and can do so between providers quickly and easily, they will benefit from enhanced competition and innovation in communications markets.

However switching between CPs is often complex, and involves steps that must be coordinated between different providers in ways that do not arise in other consumer markets. What should be an easy and seamless consumer journey as part of a vibrant market can in many respects be an obstacle-ridden process that, evidence suggests, discourages switching and thus deprives consumers of potential benefit. Additionally, consumers may suffer instances of poor service that are in themselves a cause of harm and detriment - as well as having a negative impact on the industry's reputation.

We have no reason to believe that the issues associated with switching on the Openreach copper network are substantially different from those experienced by consumers and micro businesses on KCOM's network. We remain of the view expressed in our 2012 response to Ofcom's consultation on proposals to change the processes for switching fixed voice and broadband providers on the Openreach copper network. A link to this document is attached.

Based on the evidence to date, we support Ofcom's view that a gaining provider led (GPL) process should be the model for all switching processes.

Our views on the amendment of the General Conditions (expressed in October 2013 in response to Ofcom's consultation further to its statement on the processes for switching fixed voice and broadband providers on the Openreach copper network) remain unchanged - a link is also attached to that response.

Following its earlier work in this area, Ofcom has said that the Gaining Provider Led Notification of Transfer plus (GPL NoT+) model should be implemented by June 2015. Nine months in which to implement both the NoT process and the NoT+ enhancements on the KCOM network would appear to be a sufficient length of time, given that there is only one wholesale network and that many CPs will already have experience of the Openreach NoT and NoT+ implementation programmes. It is not clear to us when the period of nine months would date from, but we would encourage implementation as close as possible to June 2015, to be consistent with consumers' experiences on the copper network elsewhere in the UK.

## Annexes

[Communications Consumer Panel response to Ofcom's consultation on proposals to change the processes for switching fixed voice and broadband providers on the Openreach copper network](#) - May 2012

[Communications Consumer Panel response to Ofcom's consultation further to its statement on the processes for switching fixed voice and broadband providers on the Openreach copper network](#) - October 2013