

Research Institute for Consumer Affairs (Ricability) is an independent consumer research charity providing information for older and disabled people.

Founded over 40 years ago by the Consumers' Association, the charity became independent in 1991, although close links remain. Ricability has extensive experience of carrying out high quality consumer research with older and disabled people, including experience in comparative product testing and providing and delivering accessible information and services. Ricability has carried out independent research on telecoms products and services for many years, and currently publishes three independent consumer guides based on this work¹.

Ricability is not a membership organisation and we do not seek to represent older and disabled consumers' views in this submission. However, we do offer comments on Ofcom's proposals in the light of related research work that we have carried out.

Our response focuses on the needs of older and disabled customers and is based on the summary version of the consultation and the questions posed within this document:

a) Should we stop regulating telecoms and rely instead on competition law?

No. Our research indicates that many older and disabled consumers have difficulty accessing telecoms services and products and affording the more specialist telecom equipment and services that some require. This has significant consequences for them in terms of accessing information, public services, leisure, education and employment opportunities.

The additional services that operators have developed to address some of the needs of older and disabled consumers, have in Ricability's experience, come as a result of regulation, or the threat of regulation. There is no evidence that they arose through competition alone.

Furthermore, Ricability believes that Ofcom should on an ongoing basis use independent research and consultation –

- to better identify the needs of older and disabled customers
- monitor existing regulations carefully to identify whether or not they are meeting needs.
- enforce breaches in regulation swiftly

c) Should we aim to regulate to achieve “equality of access”?

Yes, as noted above there is no evidence that good quality services for older and

¹ [Stay in touch: a guide to telephones and services for older and disabled people, 2004.](#) and [Calling For Help: a guide to community alarms, 2003; Choosing a textphone, 2001](#)

disabled consumers will develop without regulation, through competition alone. We would welcome more focus from Ofcom in this area. The needs of older and disabled consumers are extremely varied and it is a complex area therefore to research and regulate effectively. Importantly we would like Ofcom to ensure that the need older and disabled consumers have for access to the newer telecoms products and services are not overlooked. Broadband access for example provides considerable opportunities for improving the independence and quality of life of older and disabled consumers.

d) What should we do to help people choose and switch between suppliers?

Ofcom should ensure that independent information is available to help older and disabled consumers identify services that might best suit their needs. In the case of this group of consumers this means information that:

- is available in accessible formats
- is in clear language and easy to follow
- provides quality of service information on additional services they might use e.g. priority repair, alternative format bills etc
- provides clear price information that relates to the available packages on offer to these customers
- provides up to date information

Information that meets these criteria is not currently available.

The result of this is that older and disabled people – many of whom are on low incomes – are unable to benefit from the increased competition that is now available in the telecoms market.

e) How should universal services be provided in the future?

Universal services should be provided that enable older and disabled consumers to access telecoms services and products on an equal basis. The definition of universal services should be extended to include access to broadband and mobile services. These services are fundamental to the quality of life of many older and disabled people and influence access to many leisure, employment and education opportunities. In view of the additional costs of providing the more specialist equipment and services required by some disabled consumers, some form of levy should be placed on all providers to meet these particular costs e.g. relay services; equipment for deaf blind users. All providers however should be expected to meet their costs in providing accessible services (and information) as required by the DDA legislation and also be required to ensure that their products and services are designed and developed according to the principles of inclusive design.