



Telecoms and Pay  
TV Complaints  
Q1 (January to March) 2017

Publication date:

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# About this document

This document presents data for complaints recorded by Ofcom against the largest telecoms and pay TV providers in the quarter January 2017 to March 2017. This is Ofcom's twenty-fifth quarterly report.

This document is intended to help consumers make better informed decisions, especially those who are thinking about changing provider or purchasing a new service. We also believe that publication of provider-specific complaint volumes incentivises providers to improve their performance.

The next publication will include data for the period April to June 2017, and we expect to publish it in September 2017.

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## Section 1

# Dashboard

## Ofcom Telecoms and Pay TV complaints data

Ofcom Complaints data complaints per 100,000 subscribers				
Landline:	Q1 2017		Q4 2016	
<b>Most complaints</b>	TalkTalk	22	Plusnet	24
	Plusnet*	21	Post Office	23
	Post Office	21	TalkTalk	23
	BT†	20	EE	19
	EE	19	BT	18
	Virgin Media	12	Virgin Media	13
<b>Fewest complaints</b>	Sky	7	Sky	7
<b>Industry average</b>	16		15	
<b>Broadband:</b>				
<b>Most complaints</b>	BT	34	BT	33
	TalkTalk	29	Plusnet	30
	Plusnet	25	TalkTalk	29
	EE	24	EE	26
	Virgin Media	13	Virgin Media	13
<b>Fewest complaints</b>	Sky	8	Sky	8
<b>Industry average</b>	21		21	
<b>Mobile:</b>				
<b>Most complaints</b>	Vodafone	17	Vodafone	24
	TalkTalk	8	Talk Mobile	9
	Virgin Mobile	8	TalkTalk	8
	EE	4	Virgin Mobile	8
	O2	4	Three	4
	Three	3	EE	4
<b>Fewest complaints</b>	Tesco*	<0.5	Tesco	<0.5
<b>Industry average</b>	6		7	
<b>Pay TV:</b>				
<b>Most complaints</b>	BT	19	BT	17
	Virgin Media	9	TalkTalk	9
	TalkTalk	7	Virgin Media	9
<b>Fewest complaints</b>	Sky	2	Sky	1
<b>Industry average</b>	5		5	

\* All figures rounded to nearest whole number apart from where they are less than 0.5. Actual measurable difference may in some cases be less than one.

† Due to the different methodologies used to compile subscriber figures, readers should note that BT's performance in Q1 2017 may be comparable to TalkTalk's, Plusnet's and Post Office's (see section 4 below).

Note: Industry average is limited to those providers included in the report

Source: Ofcom, CCT data

## Section 2

# Executive summary

## Introduction

- 2.1 Ofcom's principal duty is to further the interests of citizens and consumers, where appropriate by promoting competition. In doing so we must have regard to the interests of consumers in terms of price, quality of service and value for money. Consumer information plays a critical role in promoting effective competition and the absence of key information can lead to poor purchasing decisions and inhibit switching.
- 2.2 On average, Ofcom receives nearly 300 calls a day from consumers.<sup>1</sup> Consumers also contact us by post and via our website. Many of these contacts result in complaints, and some contain more than one complaint.<sup>2</sup> These complaints are likely to be made where a consumer has been unable to resolve an issue with their provider to their satisfaction. We record these complaints by service, e.g. broadband or mobile, and by provider. We believe that this information is useful for consumers; for example, this data may be relevant to those considering a new service or change of provider. We note that provider-specific information is also available to guide consumers in areas such as financial services.
- 2.3 We have previously published data for each quarter between October 2010 and December 2016.<sup>3 4</sup> This publication provides data for the quarter January 2017 to March 2017.
- 2.4 When considering the information in this report, readers should note a number of important limitations that apply to the complaints information we publish. In particular:
- The data only covers complaints that consumers have chosen to report to Ofcom, and does not represent complaints consumers may have made directly to their

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<sup>1</sup> Ofcom received around 70,000 calls from consumers each year (*source*: Ofcom 2015/16 Annual Report, page 41: [http://www.ofcom.org.uk/content/about/annual-reports-plans/annual-reports/annual-report-15-16/Ofcom\\_Annual\\_Report\\_2015-2016.pdf](http://www.ofcom.org.uk/content/about/annual-reports-plans/annual-reports/annual-report-15-16/Ofcom_Annual_Report_2015-2016.pdf))

<sup>2</sup> Where a consumer complains about a single matter, we record that as a single complaint. If they complain about two or more separate matters relating to one service (e.g. broadband), we record that as two complaints. Where they complain about more than two matters, we record the two most serious ones (through discussion with the caller) unless it is not possible to determine this (e.g. the contact is made by letter) or the consumer insists on all complaints being logged. Complainants raising more than two matters relating to the same service account for around 1% or less of total complainants in each sector. In general, we record up to two complaints per service per contact. An average of 1.6 complaints were recorded per consumer contact with Ofcom in 2016.

<sup>3</sup> For complaints data published since Q2 2015 see <https://www.ofcom.org.uk/research-and-data/multi-sector-research/telecoms-complaints-data> and for complaints data published since October 2010 see <http://webarchive.nationalarchives.gov.uk/20160702162827/http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/complaints/>

<sup>4</sup> As a result of a number of checks, pay monthly mobile data is no longer presented in any publication prior to Q1 2014 (where it was restated); pay TV complaints were first published from October 2011 (i.e. from Q4 2011).

providers or to other agencies (e.g. Alternative Dispute Resolution schemes). As such it only provides a partial picture of complaints relating to any provider.

- The complaints data is calculated using subscriber figures provided by the operators in question, and when comparing operators' performance, it is important to note that there are some differences in the methodologies operators use to compile them.<sup>5</sup> The complaints data reflects the views of consumers as reported to Ofcom and the way we record them. Ofcom has sought to ensure that its data are sound but has not checked the veracity of individual complaints.
- Contact with Ofcom may reflect the relative (lack of) quality of complaints handling services, as well as the quality of service received. Given this, companies with poor complaints handling processes may feature more prominently than those with good complaints handling processes.
- Ofcom may see spikes in call volumes from customers of certain providers when we publicise certain types of enforcement action (e.g. investigations, fines).
- Bigger performance fluctuations are likely for smaller operators compared to larger operators because of the smaller numbers of subscribers against which complaints are measured for these operators. This should be taken into account when observing shorter term movements in the data.

2.5 The charts in this report only include complaints data from providers who met the criteria implemented up to (and including) Q1 2014,<sup>6</sup> and, from Q2 2014 onwards, those who meet the current criterion of having a market share of 1.5% or above.<sup>7</sup>

2.6 As providers vary in size, we publish complaints as a proportion of residential subscribers.<sup>8</sup> Presenting the complaint numbers in this manner ensures that meaningful comparisons can be made between the data for each provider.

2.7 The four services<sup>9</sup> covered in this publication are: fixed line telephony, fixed broadband, pay monthly mobile telephony and pay TV.

## Key findings

2.8 The main findings relating to Ofcom complaints data for the reporting period covering January 2017 to March 2017 (Q1 2017) are as follows:

- Overall complaints: In comparison with Q4 2016, the total volume of complaints per 100,000 subscribers increased by one for fixed line services, decreased by

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<sup>5</sup> Ofcom has carried out checks on the data in the report to ensure that it is accurate enough to be of use to those seeking to compare providers. In instances where there is little difference between operator complaint levels, we do not distinguish between their performances.

<sup>6</sup> Up until Q1 2014, providers were generally included in the report if they had a relevant market share of 4% and regularly generated more than 30 complaints per month. See our Q2 2014 report for information on these changes.

<sup>7</sup> Which reflects the criteria for inclusion Ofcom will generally apply, unless there are exceptional circumstances warranting a different approach.

<sup>8</sup> Complaints are displayed per 100,000 subscribers. This enables the providers to be compared on a like-for-like basis.

<sup>9</sup> As detailed in our Q2 2014 publication, we have determined that the current complaint ratios for PAYG mobile services are so small that they are unable to provide meaningful comparisons. As a result, we no longer provide basic commentary on this sector, but will continue to monitor it closely.

one for pay monthly mobile services, but remained constant for broadband and pay TV services. Broadband and fixed line services continue to generate the highest number of complaints, and Ofcom continues to receive the fewest complaints about PAYG mobile services and pay TV compared to other services included in this report.

- **Fixed line telephony:** The providers covered here are BT, EE, Plusnet, Post Office HomePhone, Sky, TalkTalk and Virgin Media. TalkTalk and Plusnet (a brand owned by BT Group), were amongst those who generated the highest volume of complaints per 100,000 subscribers in Q1 2017. The figures appear to show that BT's complaint volumes were lower than these providers', as well as Post Office HomePhone's. However, due to operators using different methodologies to compile their subscriber figures<sup>10</sup>, we have identified through sensitivity checks that BT's performance may be comparable to Post Office HomePhone's, TalkTalk's and Plusnet's. This should be taken into consideration when comparing provider performance. TalkTalk, Plusnet and BT all shared the same main complaint driver: faults, service and provision<sup>11</sup>. EE (another brand owned by BT Group) also generated complaint volumes above the industry average. Sky generated the least complaints per 100,000 subscribers compared to the other fixed line providers in the report.
- **Fixed broadband:** The providers covered here are BT, EE, Plusnet, Sky, TalkTalk and Virgin Media. BT generated the highest relative complaint volumes in Q1 2017. BT's main complaint driver related to faults, service and provision issues. TalkTalk, Plusnet and EE also generated above industry average complaint levels. Sky generated the lowest relative complaint volumes compared to the other fixed broadband providers that we report on.
- **Mobile pay-monthly telephony (excluding mobile broadband datacards and dongles):** The providers covered here are EE<sup>12</sup>, O2, TalkTalk<sup>13</sup>, Tesco Mobile, Three, Virgin Mobile and Vodafone. Vodafone had the highest relative volume of complaints this quarter, and these mainly related to issues about billing, pricing and charges. Complaint levels for TalkTalk and Virgin Mobile were above the industry average. Tesco Mobile generated the lowest relative volume of complaints compared to the other providers reported on.
- **Pay TV services:** The providers covered here are BT, Sky, TalkTalk and Virgin Media. BT generated the highest relative volume of complaints in Q1 2017. The main driver of BT's complaints related to billing, pricing and charges issues. Virgin and TalkTalk also generated complaint volumes above the industry average, while Sky generated the lowest volume of complaints per 100,000 subscribers.

2.9 For the first time, we have published an interactive tool alongside this report on the Ofcom website<sup>14</sup>. That tool allows readers to easily search for the data they want to

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<sup>10</sup> See 2.4 and A1.20

<sup>11</sup> Service in this context relates to issues with the communications service being provided, for example, coverage issues, broadband speeds, restriction of service by provider etc.

<sup>12</sup> For pay monthly mobile we present data for Orange, T-Mobile and 4GEE in an aggregated form. The charts throughout the report refer to this data as "EE".

<sup>13</sup> TalkTalk was first included in the pay monthly mobile analysis in Q3 2016, reporting on results as far as back as Q1 2016.

<sup>14</sup> We informed stakeholders of our intention to accompany this report with an interactive tool in our Q4 2016 publication (page 16). We advised readers that we would create a tool using Tableau

find (for instance by service or provider), and to make comparisons across different providers.

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software. We have instead used a different software package – Power BI – but that change has had no impact on the data available to view or how readers can engage with it.



## Section 3

# Introduction

## Background

- 3.1 Consumers' overall level of satisfaction with communications services is around 90%.<sup>15</sup> Where concerns arise, consumers typically raise their complaint with their provider in the first instance.<sup>16</sup> If the provider is not able to resolve the complaint within eight weeks, or if deadlock is reached earlier, the consumer can make an application to an independent Alternative Dispute Resolution (ADR) scheme. The ADR scheme can examine the complaint and make a judgement on the issue.<sup>17</sup>
- 3.2 In addition, some consumers choose to contact Ofcom due to our role as regulator of communications services. While we do not resolve individual complaints ourselves, we offer consumers advice on how they might best seek to resolve the issues that are raised. We also use the complaints data to inform policy, enforcement and monitoring work.<sup>18</sup> On average, we receive nearly 300 consumer calls a day, plus contacts via email and letter, each of which may involve one or more complaints.<sup>19</sup>

## Why publish provider-specific complaints?

- 3.3 Since April 2011 we have published quarterly Ofcom complaints data by provider. Complementary to this report, we have also, since 2009, regularly published research on 'customer service satisfaction' on a provider-specific basis. The latest research was published as part of Ofcom's 'Comparing Service Quality' report in April 2017.<sup>20</sup>
- 3.4 The publication of performance data like this is consistent with our statutory duty relating to transparency and our obligations as a public authority. Moreover, it is in line with our principal duty to further the interests of citizens and consumers, where appropriate by promoting competition. Consumer information plays a critical role in ensuring that competitive communications markets work for consumers. The absence of information can lead to poor purchasing decisions. Therefore, if information is not readily available or is unclear, there may be a case for Ofcom to intervene in the interests of consumers. Under section 26 of the Communications

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<sup>15</sup> Ofcom, *The Communications Market 2016*, pages 167 – 170, 172

[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0024/26826/cmr\\_uk\\_2016.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0024/26826/cmr_uk_2016.pdf)

<sup>16</sup> This has been found in research, including, for example, that carried out for the 2008 Consumer Complaints Review available at

[http://stakeholders.ofcom.org.uk/binaries/consultations/alt\\_dis\\_res/research.pdf](http://stakeholders.ofcom.org.uk/binaries/consultations/alt_dis_res/research.pdf)

<sup>17</sup> Ofcom requires all CPs to be a member of an approved ADR scheme: [Ombudsman Services: Communications](#) and the [Communications and Internet Services Adjudication Scheme](#). Ofcom is currently carrying out a review of the two schemes that we approve

<https://www.ofcom.org.uk/consultations-and-statements/category-2/adr-review-17>

<sup>18</sup> Information on any investigation we launch as a result of complaints to Ofcom can be found in the enforcement bulletin <http://stakeholders.ofcom.org.uk/enforcement/competition-bulletins/>

<sup>19</sup> See footnotes 1 and 2.

<sup>20</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0012/100605/comparing-service-quality-report.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0012/100605/comparing-service-quality-report.pdf)

2003, we have a duty to arrange for the publication of such information and advice as appears to us to be appropriate to make available to consumers.<sup>21</sup>

- 3.5 We recognise that there is no single source of information that can give consumers a full picture of the relative performance of different providers. In addition, different service features will matter more for some consumers than for others. Ofcom research suggests that, for many consumers, comparative price and network performance information is of primary importance. In light of this, we have ensured that consumers have improved information available in these areas. Examples include publication of broadband speeds research,<sup>22</sup> mobile coverage maps,<sup>23</sup> and our scheme for accrediting price comparison calculators.<sup>24</sup>
- 3.6 In addition, the publication of provider-specific complaints data may act as an incentive for providers to improve their performance.<sup>25</sup> Similar information is also available to guide consumers in a number of other sectors, including, for example, financial services.<sup>26</sup>
- 3.7 We believe that our complaints data, along with other information,<sup>27</sup> can be useful for consumers seeking to compare providers.<sup>28</sup> We also observe that the data is of interest to intermediaries such as consumer groups, journalists and price comparison services who advise consumers.
- 3.8 This transparent approach is consistent with the current Government's view that the publication of complaints data "will encourage businesses to improve their performance and help customers to make informed choices about the products and services they buy".<sup>29</sup>
- 3.9 Taking the above into consideration, we consider that the objectives of publishing this report are to:
- ensure transparency of data;
  - further the interests of citizens and consumers by providing them with information that will help them facilitate and take advantage of a competitive market; and

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<sup>21</sup> Having regard to the need to exclude confidential information from publication. For the reasons set out here, Ofcom considers that, having had that regard, publication of the information in this report is appropriate.

<sup>22</sup> Available at: <https://www.ofcom.org.uk/research-and-data/telecoms-research/broadband-research/broadband-speeds>

<sup>23</sup> <http://maps.ofcom.org.uk/check-coverage/>

<sup>24</sup> See: <https://www.ofcom.org.uk/consultations-and-statements/category-2/price-calculator-accreditation>

<sup>25</sup> See the responses of key consumer groups to Ofcom's consultation on complaints handling procedures at:

[http://stakeholders.ofcom.org.uk/consultations/complaints\\_procedures/?showResponses=true](http://stakeholders.ofcom.org.uk/consultations/complaints_procedures/?showResponses=true)

<sup>26</sup> <http://www.fca.org.uk/consumers/complaints-and-compensation/complaints-data>

<sup>27</sup> For example, information on price, speed, coverage, contract terms and so on.

<sup>28</sup> In the Statement for our Review of Complaints Procedures, we said that publishing complaints data would likely benefit consumers in respect of price, quality and value for money. We also noted that there are a number of ways for such information to be made public. See:

[http://stakeholders.ofcom.org.uk/consultations/complaints\\_procedures/statement/](http://stakeholders.ofcom.org.uk/consultations/complaints_procedures/statement/)

<sup>29</sup> Page 19 of *A better deal: boosting competition to bring down bills for families and firms*: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/480797/a\\_better\\_deal\\_for\\_families\\_and\\_firms\\_print.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/480797/a_better_deal_for_families_and_firms_print.pdf)

- incentivise improved provider performance.
- 3.10 This is the twenty-fifth report to include Ofcom telecoms complaints data by provider, and the twenty-first to include complaints data about pay TV services. It is the first to feature an interactive tool for readers.
- 3.11 Further information about the methodology for compiling the complaints data, including how we account for the variation in size of provider and how we record complaints about bundled services, can be found in Annex 1.

## Section 4

# Telecoms and Pay TV complaints

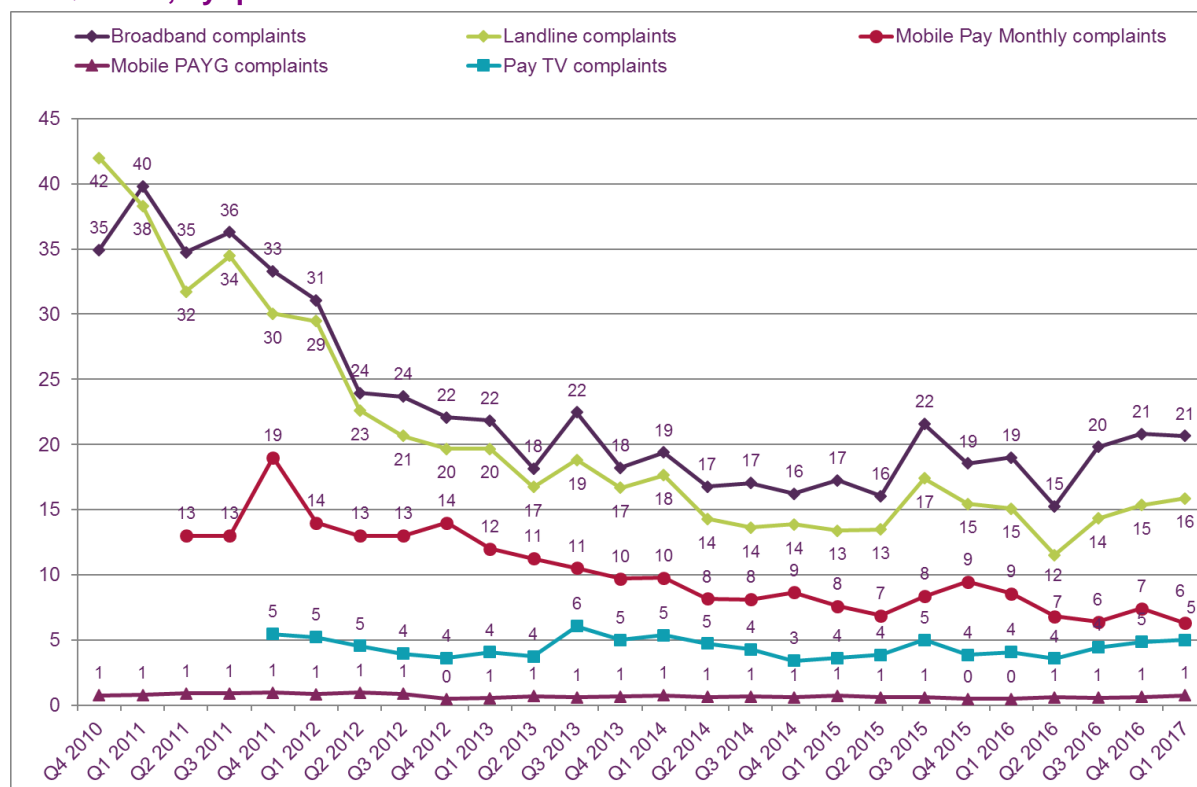
## Introduction

4.1 This section sets out our data on residential consumer complaints received by Ofcom across fixed line, broadband, pay monthly mobile and pay TV services. Data is presented on a quarterly basis from Q2 (April – June) 2015 to Q1 (January – March) 2017 inclusive.<sup>30</sup> Only providers who meet the current generally applied criterion for inclusion (having a market share of 1.5% or more in the relevant market<sup>31</sup>) are included in the report. For each sector we also present a table noting performance over the most recent quarter only. The information is presented per 100,000 subscribers for the period covered.

## Relative complaints by service sector

4.2 Figure 1 shows that broadband and fixed line services generate the highest number of complaints. Ofcom continues to receive the fewest complaints about PAYG mobile services and pay TV compared to the other services included in this report.

**Figure 1: Relative volume of complaints per sector per 100,000 subscribers: Q4 2010 – Q1 2017, by quarter**



Source: Ofcom, CCT data

<sup>30</sup> Except for Figure 1 which shows complaint volumes dating further back to: Q4 (October – December) 2010 for broadband, fixed line, and mobile PAYG services; Q2 (April – June) 2011 for pay monthly mobile services; and Q4 (October – December) 2011 for pay TV services.

<sup>31</sup> A provider will generally be removed from the report if its market share has dropped below 1.5% for four consecutive quarters.

## Landline complaints

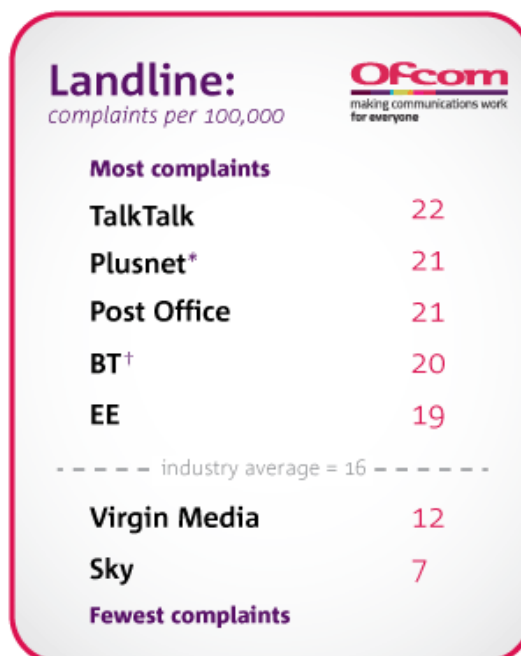
4.3 The following figures show the residential consumer complaints that Ofcom received against the largest providers of fixed line telephony services in Q1 (January – March) 2017, and between Q2 (April – June) 2015 and Q1 (January – March) 2017 inclusive.

4.4 TalkTalk and Plusnet (a brand owned by BT Group) were amongst those who generated the highest volume of complaints per 100,000 subscribers in Q1 2017. The figures appear to show that BT's complaint volumes were lower than these providers', as well as Post Office HomePhone's. However, due to operators using different methodologies to compile their subscriber figures<sup>32</sup>, we have identified through sensitivity checks that BT's performance may be comparable to Post Office HomePhone's, Plusnet's and TalkTalk's. This should be taken into consideration when comparing provider performance.

4.5 TalkTalk, Plusnet and BT all share the same main complaint drivers. They received the most complaints relating to faults, service and provision, followed by issues about billing, pricing and charges, and complaint handling.

4.6 EE (another brand owned by BT Group), also generated relative complaint volumes above the industry average. Sky generated the least complaints per 100,000 subscribers compared to the other landline providers in the report.

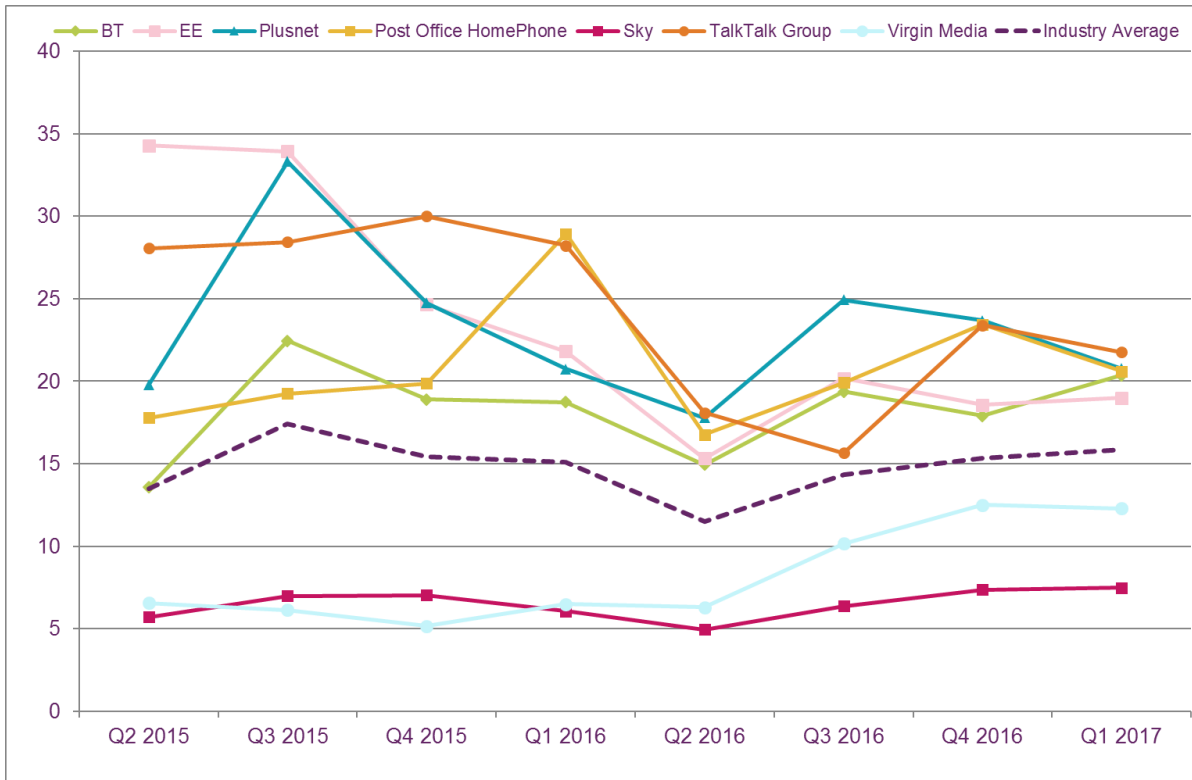
Figure 2: Landline complaints per 100,000 subscribers: Q1 2017



\*All figures rounded to nearest whole number.  
Actual measurable difference may in some cases be less than one.  
† Due to the different methodologies used to compile subscriber figures, readers should note that BT's performance in Q1 2017 may be comparable to TalkTalk's, Plusnet's and Post Office's  
Note: Industry average is limited to those providers included in the report  
Source: Ofcom, CCT data

<sup>32</sup> See 2.4 and A1.20

**Figure 3: Landline complaints per 100,000 subscribers: Q2 2015 – Q1 2017**



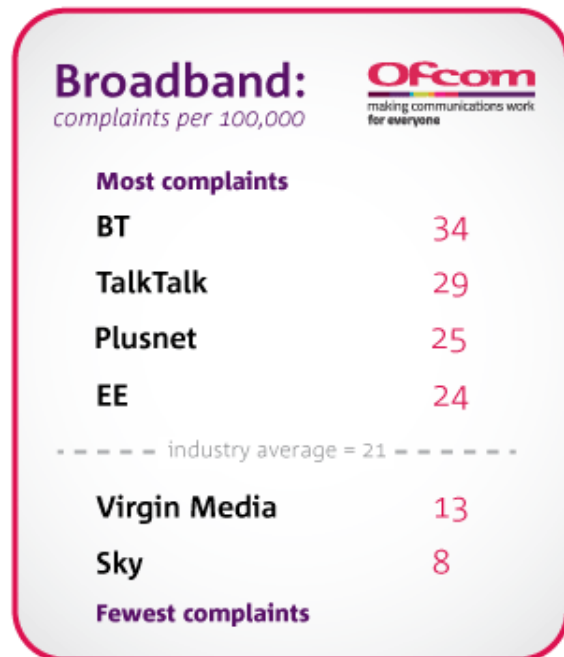
*Note: Industry average is limited to those providers included in the report. Source: Ofcom, CCT data*

## Fixed broadband complaints

4.8 The following figures show the residential consumer complaints that Ofcom received against the largest providers of fixed broadband services in Q1 (January – March) 2017, and between Q2 (April – June) 2015 and Q1 (January – March) 2017 inclusive.

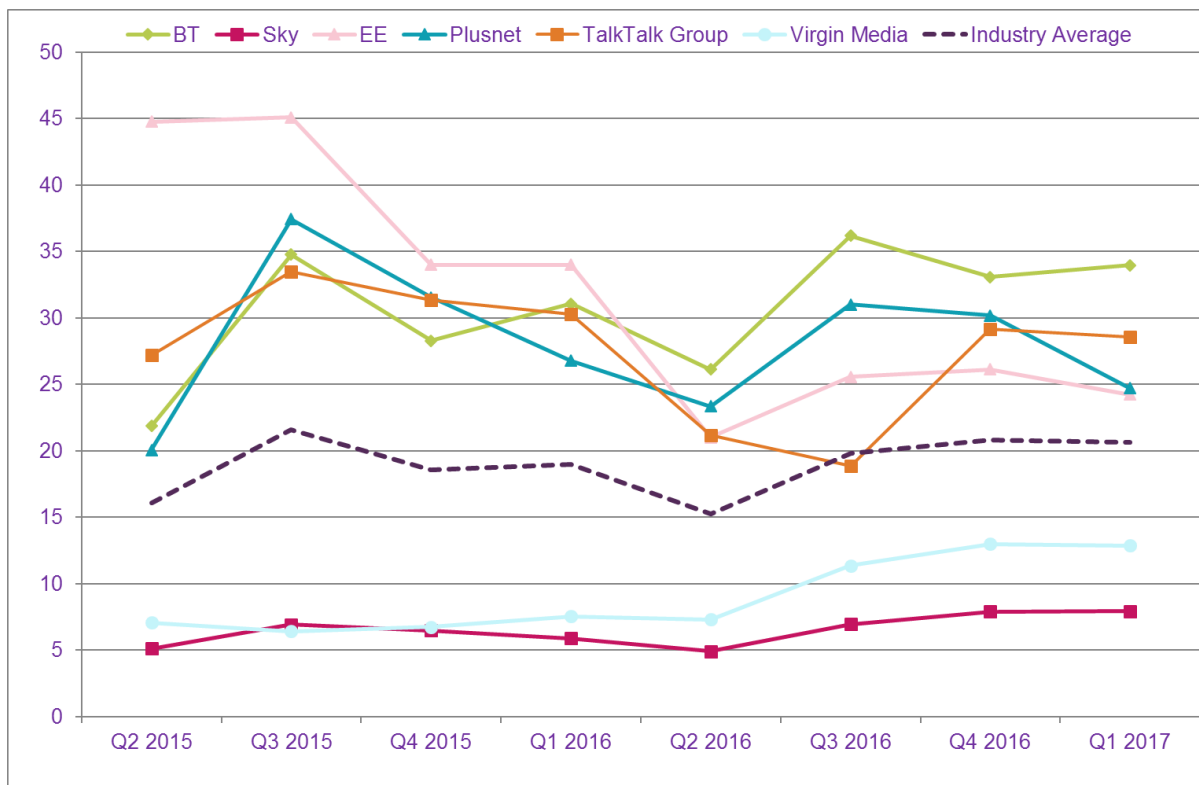
4.9 Figures 4 and 5 show that BT generated the highest relative complaint volumes in Q1 2017. BT’s main complaint drivers related to faults, service and provision issues, followed by issues around complaints handling and issues with billing, pricing, and charges. TalkTalk, Plusnet and EE also generated above industry average complaint levels. Sky generated the lowest relative complaint volumes compared to the other fixed broadband providers that we report on.

Figure 4: Fixed broadband complaints per 100,000 subscribers: Q1 2017



Note: Industry average is limited to those providers included in the report  
Source: Ofcom, CCT data

Figure 5: Fixed broadband complaints per 100,000 subscribers: Q2 2015 – Q1 2017

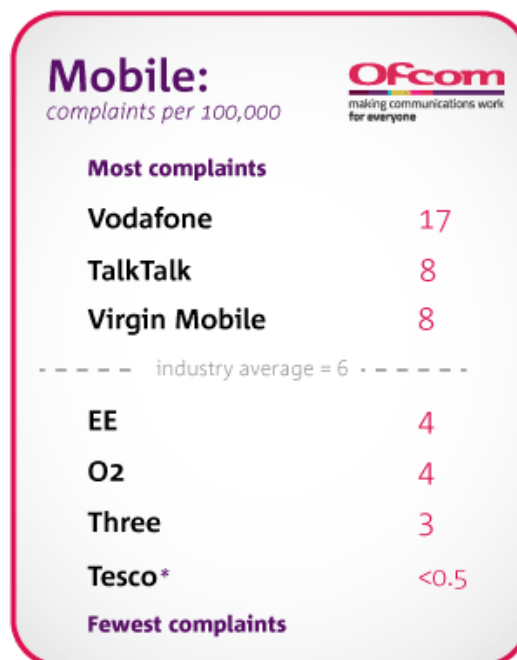


Note: Industry average is limited to those providers included in the report. Source: Ofcom, CCT data

## Pay monthly mobile complaints

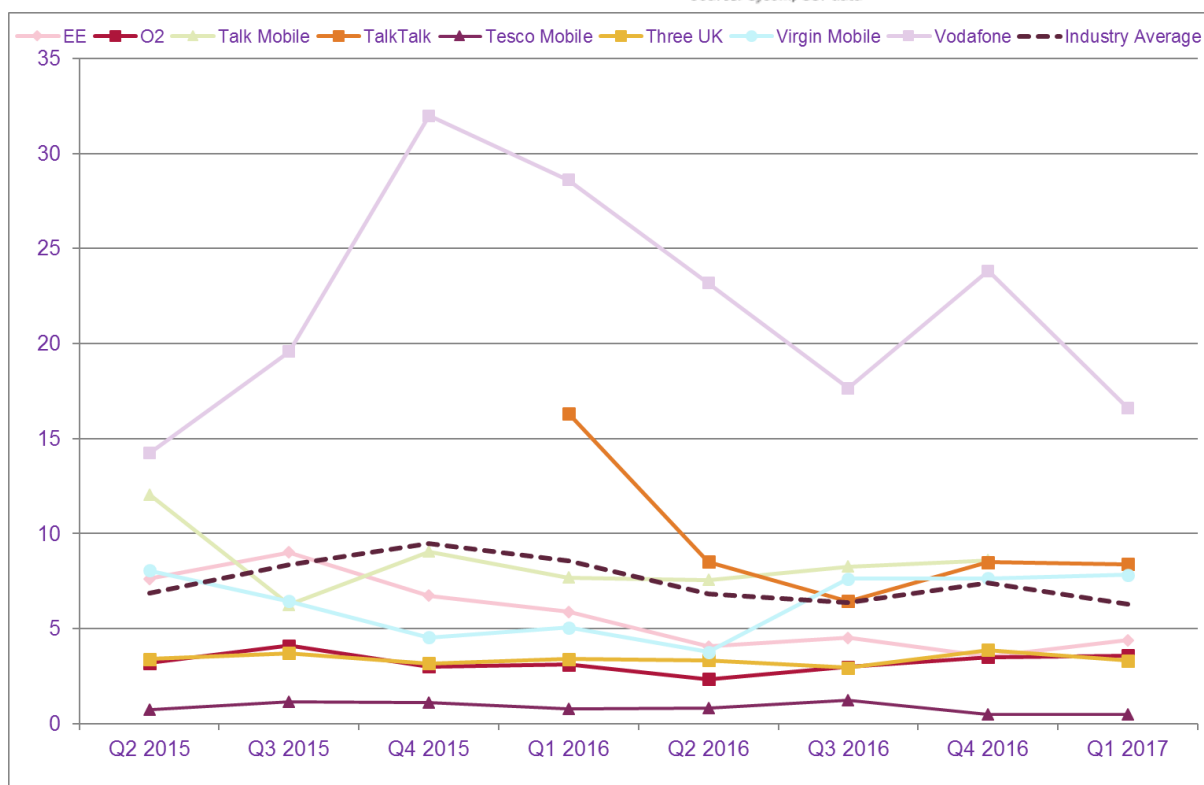
- 4.10 The following figures show the residential consumer complaints that Ofcom received against the largest providers of pay monthly mobile services<sup>33</sup> in Q1 (January – March) 2017, and between Q2 (April – June) 2015 and Q1 (January – March) 2017 inclusive.
- 4.11 Figures 6 and 7 show that Ofcom received the most complaints per 100,000 subscribers about Vodafone for the tenth quarter running.<sup>34</sup> These mainly related to issues about billing, pricing and charges, followed by complaints handling and faults, service and provision issues. Complaint levels for TalkTalk and Virgin Mobile were above the industry average. Tesco Mobile generated the lowest relative volume of complaints compared to the other providers reported on.

Figure 6: Pay monthly mobile telephony complaints per 100,000 subscribers: Q1 2017



\*All figures rounded to nearest whole number apart from where they are less than 0.5.  
Actual measurable difference may in some cases be less than one.  
Note: Industry average is limited to those providers included in the report  
Source: Ofcom, CCT data

Figure 7: Pay monthly mobile complaints per 100,000 subscribers: Q2 2015 – Q1 2017



Note: Industry average is limited to those providers included in the report. Source: Ofcom, CCT data

<sup>33</sup> These exclude complaints about mobile broadband services (datacards and dongles).

<sup>34</sup> The increase in Vodafone's complaints per 100,000 subscribers in Q4 2016 was affected by a spike in complaint numbers following the news, published in October 2016, that Ofcom had fined Vodafone for mis-selling, inaccurate billing and poor complaints handling procedures.



## Pay TV Complaints

4.12 Figures 8 and 9 show the residential consumer complaints that Ofcom received against the largest providers of pay TV services Q1 (January – March) 2017, and between Q2 (April – June) 2015 and Q1 (January – March) 2017 inclusive.

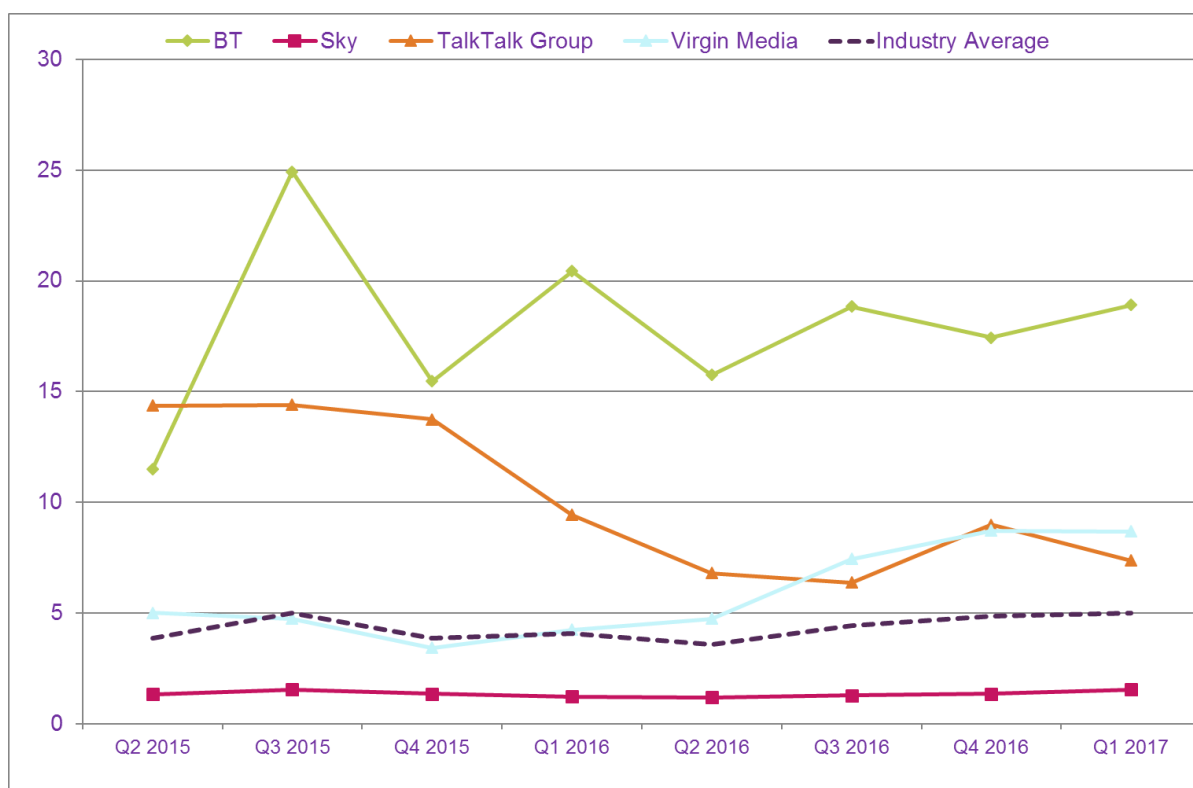
4.13 BT generated the highest relative volume of complaints in Q1 2017. The main driver of BT's complaints related to billing, pricing and charges, faults, service and provision issues, and complaints handling. Virgin and TalkTalk also generated complaint volumes above the industry average, while Sky generated the lowest volume of complaints per 100,000 subscribers.

**Figure 8: Pay TV complaints per 100,000 subscribers: Q1 2017**



*Note: Industry average is limited to those providers included in the report  
Source: Ofcom, CCT data*

**Figure 9: Pay TV complaints per 100,000 subscribers: Q2 2015 – Q1 2017**



*Note: Industry average is limited to those providers included in the report. Source: Ofcom, CCT data*

## Annex 1

# Telecoms and Pay TV complaints detailed methodology

## Introduction

- A1.1 Consumers, both residential and business, can contact Ofcom with complaints or enquiries over the phone, by letter or through one of the dedicated complaint submission forms on our website.<sup>35</sup> All complaints<sup>36</sup> are logged in the same database by Ofcom's Consumer Contact Team (CCT), providing a record of the total complaints that Ofcom has received, as well as details on the services affected and the providers of those services.
- A1.2 In this Annex we outline key elements of the approach we take to the publication of our complaints data.

## Scope of the data published

- A1.3 We collect complaints data across a wide range of services - broadcasting, spectrum, telecoms and post.<sup>37</sup>
- A1.4 The focus of this publication is complaints made by residential<sup>38</sup> consumers in relation to fixed line telephony, fixed broadband, mobile telephony and pay TV.
- A1.5 Consumers complain to Ofcom about a wide range of issues<sup>39</sup> so we have considered carefully the way we record complaints and what level of data would be useful and robust enough for publication. In any particular call to Ofcom, or other contact with us, a consumer may complain about one or more separate matters. If they complain about two separate matters (e.g. billing and complaint handling) relating to one service (e.g. broadband), we record that as two complaints. Where they complain about more than two matters, we generally record only the two most serious ones per service unless it is not possible to determine this through discussion with the consumer (e.g. the contact is made by letter) or the consumer insists on all their complaints being logged. Complainants raising more than two matters relating to the same service account for around 1% or less of total complainants in each sector. In general, we record up to two complaints per service per contact. An average of 1.6 complaints were recorded per consumer contact with Ofcom in 2016.

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<sup>35</sup> Refer to: <https://www.ofcom.org.uk/complain-to-ofcom>

<sup>36</sup> A complaint is an expression of dissatisfaction made by a customer related to the communications provider's services, or to the complaint-handling process itself. Where the complaint is made to Ofcom over the phone, the consumer is asked whether their call is about an enquiry or complaint.

<sup>37</sup> We publish complaints about the content of programmes broadcast on television by provider in our Broadcasting Bulletins. Spectrum complaints cannot be reported in more detail as the majority of complaints are about interference and as such are not provider specific.

<sup>38</sup> Ofcom records business and residential telecoms complaints separately, based on how the individual identifies themselves when reporting the complaint.

<sup>39</sup> We currently record over 159 different categories of telecoms complaints.

A1.6 In view of the complexity of some of the data, our current position is that we should only publish complaints data by service rather than by detailed category of complaint for each service.

A1.7 The four services<sup>40</sup> covered in this publication are:

- Fixed line telephony - includes complaints against companies that offer both line rental and calls as well as those that supply calls only services;
- Fixed broadband - includes copper based ADSL services, cable services and fibre services;
- Pay monthly mobile services;<sup>41</sup> and
- Pay TV - includes complaints relating to access to the service but does not include the content delivered over the pay TV service. This category includes services provided through cable, satellite, digital terrestrial television or over a dedicated broadband connection.

## Complaints about bundled services

A1.8 Many consumers choose to purchase a bundle of services from one provider (for example, fixed line telephony with a fixed broadband service). Any issues that subsequently arise may affect one or more of those services and this influences how a complaint may be recorded by us.

A1.9 The approach we take when recording complaints received from consumers who take a bundle of services from a provider is as follows:

- If the complaint only relates to one of the services in the bundle, the complaint is recorded against that single service only. For example, if a consumer has fixed line telephony and fixed broadband as part of a bundle and complains about slow broadband speeds, the complaint would be logged against the broadband service only as it is this aspect of the service that is causing the problem.
- If the complaint is about an issue that affects a number of services in a bundle, the complaint is recorded against each affected service for that provider. For example, if a consumer complains about being mis-sold a triple play service, the complaint will be counted as a fixed telephony, fixed broadband and as a pay TV complaint for that provider.

A1.10 This approach enables us to have a record of all complaints received by provider and by service. Also, as we are publishing total complaints by provider for each service, but not across the services in aggregate, the complaints are not double counted.

## Complaints about transfers to unknown providers

A1.11 If a consumer is unexpectedly told by their existing provider that a request has been made to transfer their service to another provider, they may complain to Ofcom

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<sup>40</sup> See footnote 9.

<sup>41</sup> Mobile pay monthly services will include complaints about use of data through a mobile handset but do not include dongles or datacards.

without knowing the name of the new provider.<sup>42</sup> In these circumstances Ofcom refers the case to Openreach to find out recent activity on the line, including applications to transfer and completed transfers. If a request for a transfer has been made by another provider, the complaint is recorded against that other provider. If no request for a transfer has been made, then the complaint is recorded against the existing provider.

## Focus on the largest providers

- A1.12 Ofcom records complaints received by it against any provider in the UK. The size of each individual provider varies greatly, as does the number of complaints received. As a result, to ensure that this report covers as many providers as reasonably practicable, we adopt a criterion to help us decide which providers are included in the report.
- A1.13 Specifically, following a review,<sup>43</sup> from Q2 2014 onwards this report now generally includes complaints data<sup>44</sup> for those providers which, for the service being reported, have a market share of 1.5% or more in the relevant market.
- A1.14 For providers included in the reporting for periods before Q2 2014, we have not retrospectively adjusted the previous generally applied publication criteria for inclusion (i.e. having a 4% market share and regular generation of at least 30 complaints per month). Therefore, the previous criteria still apply to those reports. In addition, a provider will generally<sup>45</sup> be removed from the report if, from Q2 2014 onward, its market share has dropped below 1.5% for four consecutive quarters.
- A1.15 The current scope of the report encompasses the providers set out in Table 1 below. Together, these providers account for over 90% of each market covered.<sup>46</sup>

**Table 1: Providers included in this publication**

<b>Fixed Line Telephony</b>	BT
	EE
	Plusnet
	Post Office HomePhone
	Sky
	TalkTalk Group
	Virgin Media
<b>Fixed Broadband</b>	BT
	EE
	Plusnet
	Sky
	TalkTalk Group
	Virgin Media

<sup>42</sup> Their existing provider may not have visibility of the new provider either, and may only be aware that a request has been made to take over the service.

<sup>43</sup> See our Q2 2014 report for further detail.

<sup>44</sup> In the absence of exceptional circumstances, in which, should they apply, we may take a different approach.

<sup>45</sup> In the absence of exceptional circumstances.

<sup>46</sup> At least 90% of market for fixed lines, 97% for fixed broadband, 97% for pay monthly mobile telephony and 90% for pay TV.

Mobile Pay Monthly	EE <sup>47</sup>
	O2
	TalkTalk Group <sup>48</sup>
	Tesco Mobile
	Three
	Virgin Mobile
	Vodafone
Pay TV	BT
	Sky
	TalkTalk Group
	Virgin Media

## Aggregating data

A1.16 For pay monthly mobile we present data for Orange, T-Mobile and 4GEE in an aggregated form. The charts throughout the report refer to this data as “EE”.

## Complaints as a proportion of subscribers

A1.17 Other things being equal, the more subscribers a provider has the more complaints are likely to be made. Given the variation in size of provider, we publish complaints as a proportion of the relevant subscriber base to put complaints numbers into context and to help ensure the data is more meaningful for consumers.

A1.18 To achieve this, we use the number of subscribers<sup>49</sup> provided to Ofcom by the operators in question. We do not collect these data for pay TV providers and so, to calculate pay TV complaints per one-hundred thousand subscribers, we use customer data from the providers own published investor reports. All of the pay TV providers that we report on publish subscription data on a regular basis as part of their updates to investors.

A1.19 We understand from providers that quarterly subscription data is more robust than monthly data<sup>50</sup> and therefore we use quarterly data to calculate the complaints data.

A1.20 While the subscriber figures provided to Ofcom are the most accurate ones available to each provider, there are some differences in the methodologies which have been used to compile them. These differences mean that there may be instances where one provider has reported a customer as being a residential user when another would not have. Ofcom has carried out checks on the data in the report to ensure that it is accurate enough to be of use to those seeking to compare providers. In instances where there is little difference between operator complaint levels, we do not distinguish between their performances in our analysis.

A1.21 For reference, fixed line telephony can be provided as a combined calls and line rental service or as a call only service. As both services can generate fixed line complaints, Ofcom considers it is appropriate for them both to be included in the customer base used here.

<sup>47</sup> This includes Orange, T-Mobile and 4GEE.

<sup>48</sup> TalkTalk was first included in the pay monthly mobile analysis in Q3 2016, reporting on results as far as back as Q1 2016.

<sup>49</sup> Note that it is possible for an individual to have more than one subscription.

<sup>50</sup> Particularly where the quarterly data is reported externally.

## The industry average line

A1.22 As an additional data point against which to measure the performance of each provider, we include an industry average line. This shows the average number of complaints per 100,000 subscribers across all the providers included in the published data for each service. It does not include smaller providers who generally have a market share lower than 1.5%.