
Telecoms and pay-TV complaints

Q3 (July to September) 2018

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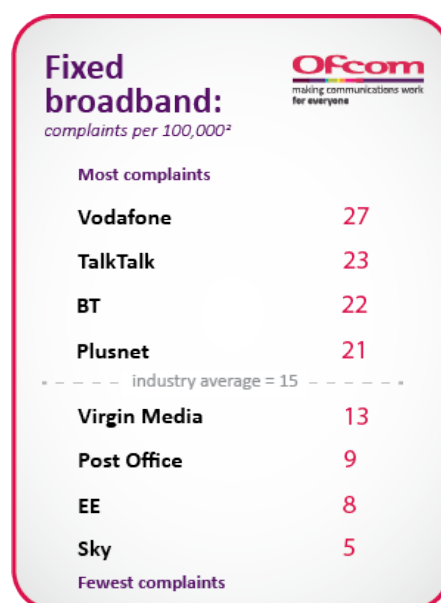
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1. Overview

- 1.1 Ofcom receives complaints from residential customers about their landline, fixed broadband, pay-monthly mobile and pay-TV services. We compile that data and work out the number of complaints received by provider and by service. To account for differences in the size of providers we calculate the number of complaints received per 100,000 customers. We publish that data on a quarterly basis.
- 1.2 The complaints data for Q3 (July to September) 2018 is presented in the league tables below.¹ We believe this is important information for customers to be aware of when comparing providers and deciding which service to opt for. Section 2 and Annex A1 of this report explain a number of points about the data, including its limitations, which readers should be aware of. The next complaints publication will include data for the period October to December 2018, and we expect to publish it in April 2019.

Fixed broadband

- Sky generated the lowest volume of complaints per 100,000 subscribers.
- Vodafone generated the highest volume of complaints per 100,000 subscribers.
- Vodafone and Post Office have been added to the table for the first time this quarter as their subscriber base has increased.
- For Vodafone, the main complaint driver was changing provider followed by complaints handling and faults, service and provision issues.³
- TalkTalk, BT and Plusnet also generated complaint volumes, per 100,000 subscribers, above the industry average.



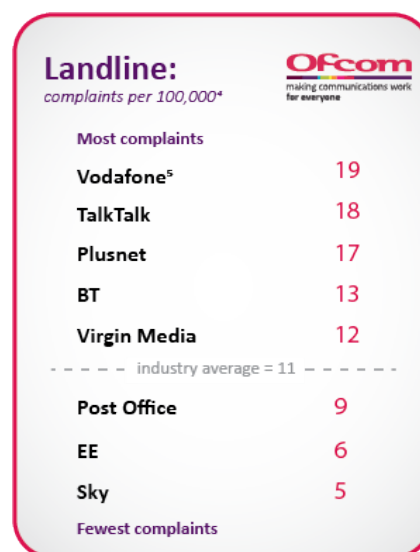
¹ All figures rounded to the nearest whole number. Actual measurable difference may in some cases be less than one. All complaint volumes are displayed per 100,000 subscribers. The industry averages are limited to those providers included in the report. All complaints data is sourced from Ofcom's Consumer Contact Team.

² Vodafone and Post Office have been added to the complaints table for the first time this quarter as they have reached a stable market share above 1.5%. See A1.14 – A1.17 for more information on reporting criteria.

³ 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.

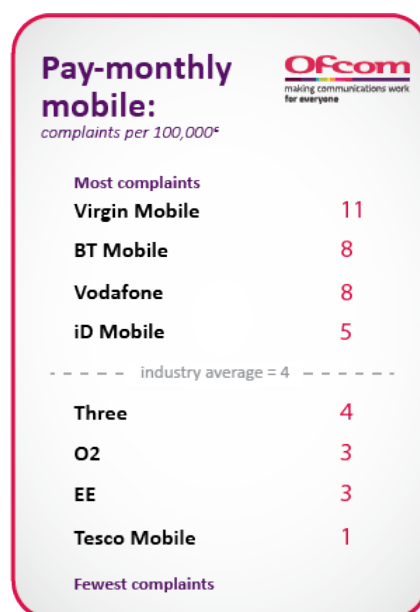
Landline

- Sky and EE generated the lowest volume of complaints per 100,000 subscribers.
- Vodafone generated the highest volume of complaints per 100,000 subscribers.
- TalkTalk, Plusnet and BT also generated complaint volumes, per 100,000 subscribers above the industry average.
- Vodafone’s main complaint driver was faults, service and provision issues, followed by complaints handling and changing provider.



Pay-monthly mobile

- Tesco Mobile generated the lowest volume of complaints per 100,000 subscribers.
- Virgin Mobile generated the highest volume of complaints per 100,000 subscribers.
- Virgin Mobile’s main complaint drivers were issues related to complaints handling, followed by billing, prices and charges and changing provider.
- Vodafone and BT Mobile also generated complaint volumes, per 100,000 subscribers, which were above the industry average.



⁴ The actual measurable difference between the following landline complaints per 100,000 subscribers are less than one and so their results should be considered comparable. This is the case for: 1. Virgin Media and the Industry Average 2. EE and Sky.

⁵ Vodafone has been added to the complaints table as they have reached a stable market share above 1.5%. See A1.14 – A1.17 for more information on reporting criteria.

⁶ The actual measurable difference between the following pay-monthly mobile complaints per 100,000 subscribers are less than one and so their results should be considered comparable. This is the case for: 1. BT and Vodafone; 2. iD Mobile, the industry average and Three; 3. Three and O2; 4. O2 and EE.

Pay TV

- Sky generated the lowest volume of complaints per 100,000 subscribers.⁷
- Virgin Media generated the highest volume of complaints per 100,000 subscribers.
- Virgin Media’s main complaint drivers were contract issues, followed by complaints handling, and billing, pricing and charge issues.
- BT and TalkTalk received complaint volumes, per 100,000 subscribers, above the industry average.



⁷ Following a restatement from Sky in November 2019, we have adjusted the Sky pay TV and industry average complaints per 100,000 subscribers figures for Q3 2018 in more recent reports. Please see the Q2 2019 report onwards for revised data. Changes to the pay TV industry average mean that in Q3 2018 the volume of TalkTalk complaints per 100,000 subscribers was comparable with the industry average.

2. Background

- 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 Consumers' overall level of satisfaction with communications services is 87% for landline services, 80% for broadband services and 91% for all mobile services.⁸ Where concerns arise, consumers typically raise their complaint with their provider in the first instance.⁹ 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.¹⁰
- 2.3 In addition, some consumers choose to contact Ofcom due to our role as regulator of communications services. On average, we receive nearly 300 consumer contacts a day, by telephone call, email, letter and social media.¹¹ Many of these contacts result in complaints, and some contain more than one complaint.¹² These complaints are likely to be made where a consumer has been unable to resolve an issue with their provider to their satisfaction. 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.

⁸ See Choosing the best broadband, mobile and landline provider - Comparing Service Quality 2017 (see pages 8-9) (https://www.ofcom.org.uk/_data/assets/pdf_file/0023/113639/full-report.pdf).

⁹ 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

¹⁰ Ofcom requires all providers to be a member of an approved ADR scheme: [Ombudsman Services: Communications](#) and the [Communications and Internet Services Adjudication Scheme](#).

¹¹ Ofcom received around 99,000 calls and items of correspondence directly from consumers in 2017/18 (source: Ofcom 2017/18 Annual Report, page 39: https://www.ofcom.org.uk/_data/assets/pdf_file/0012/115230/annual-report-1718-accessible.pdf)

¹² 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. fixed 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.

- 2.4 We record complaints by service (e.g. fixed 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.
- 2.5 We also use the complaints data to inform policy, enforcement and monitoring work¹³ to deliver positive results for consumers. One example of this is our work on complaints handling and customer service, where we continue to remain concerned that complaint volumes are too high. We are currently focused on driving down complaints to Ofcom in these areas and are working with the industry to target reductions in complaint numbers.

Why publish provider-specific complaints?

- 2.6 We consider there are a range of measures that are useful to consumers in terms of understanding service quality. Since April 2011 we have published quarterly residential 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 May 2018.¹⁴ That report includes additional consumer research and other metrics, broken down by service and provider, showing, for example, general levels of consumer satisfaction, satisfaction with reliability and satisfaction with complaints handling.
- 2.7 The ADR schemes that Ofcom approves, Communications and Internet Services Adjudication Scheme (CISAS) and Ombudsman Services: Communications (OS), also publish quarterly complaints information regarding their member CPs that have a market share over 1.5%.¹⁵
- 2.8 The publication of performance data 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 2003, we have a duty to arrange for the publication of

¹³ 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/>

¹⁴ See [The 2018 Comparing Service Quality - May 2018](#).

¹⁵ See <https://www.cedr.com/cisas/quarterly-case-data/> and <https://www.ombudsman-services.org/for-consumers/complaints-data>

such information and advice as appears to us to be appropriate to make available to consumers.¹⁶

- 2.9 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,¹⁷ mobile coverage maps,¹⁸ and our scheme for accrediting price comparison calculators.¹⁹
- 2.10 In addition, the publication of provider-specific complaints data may act as an incentive for providers to improve their performance.²⁰ Similar information is also available to guide consumers in a number of other sectors, including, for example, financial services.²¹
- 2.11 We believe that our complaints data, along with other information,²² can be useful for consumers seeking to compare providers.²³ We also observe that the data is of interest to intermediaries such as consumer groups, journalists and price comparison services who advise consumers.
- 2.12 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
 - incentivise improved provider performance.

¹⁶ 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.

¹⁷ Available at: <https://www.ofcom.org.uk/research-and-data/telecoms-research/broadband-research/broadband-speeds>

¹⁸ <http://maps.ofcom.org.uk/check-coverage/>

¹⁹ See: <https://www.ofcom.org.uk/consultations-and-statements/category-2/price-calculator-accreditation>

²⁰ 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

²¹ <http://www.fca.org.uk/consumers/complaints-and-compensation/complaints-data>

²² For example, information on price, speed, coverage, contract terms and so on.

²³ 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/

- 2.13 Further information about the methodology for compiling the complaints data, including how we account for the variation in size of provider, limitations of the data and how we record complaints about bundled services, can be found in Annex 1.

3. Trend data

Introduction

- 3.1 This section sets out our trend data²⁴ on residential consumer complaints received by Ofcom across landline, fixed broadband, pay-monthly mobile and pay TV services, by CP.²⁵
- 3.2 In general, the data is presented on a quarterly basis from Q4 (October to December) 2016 to Q3 (July to September) 2018 inclusive.²⁶ Only providers who meet the current generally applied criterion for inclusion (having a market share of 1.5% or more in the relevant market) are included in the report. The information is presented per 100,000 subscribers for the period covered.
- 3.3 An interactive tool which accompanies this report has now been updated to include this Q3 2018 data.²⁷ It allows readers to easily search for the data they want to find (for instance by service or provider), and to make comparisons across different providers.

²⁴ The industry averages are limited to those providers included in the report. All complaints data is sourced from Ofcom's Consumer Contact Team.

²⁵ As detailed in our Q2 2014 report, we have determined that the current complaint ratios for pay-as-you-go (PAYG) mobile services are so small that they are unable to provide meaningful comparisons. As of the Q3 2017 report, given the lack of change in the PAYG results, we have removed the PAYG trend data but it is still accessible in the csv file that accompanies this report <https://www.ofcom.org.uk/research-and-data/multi-sector-research/telecoms-complaints-data>

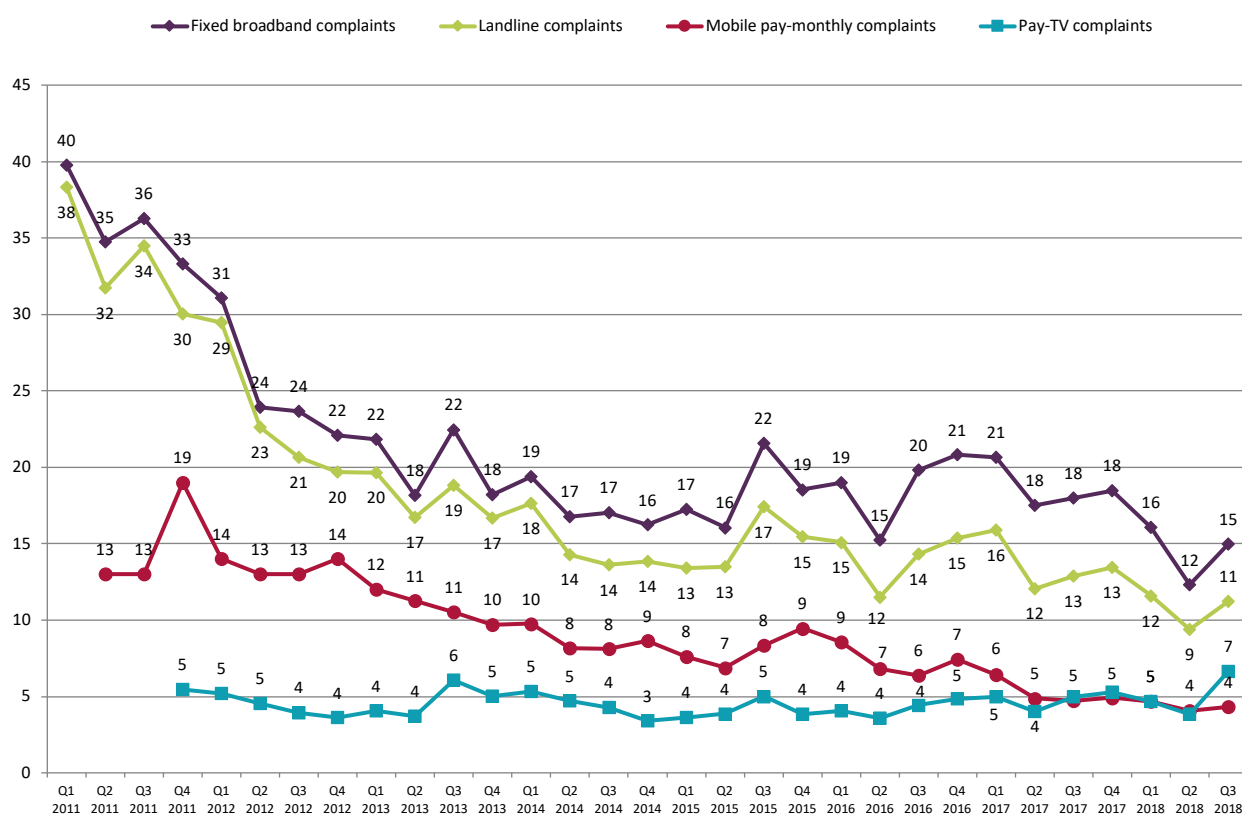
²⁶ Figure 1 shows complaint volumes dating further back to: Q1 (January – March) 2011 for fixed broadband and fixed line services, Q2 (April – June) 2011 for pay-monthly mobile services; and Q4 (October – December) 2011 for pay-TV services.

²⁷ <https://www.ofcom.org.uk/research-and-data/multi-sector-research/telecoms-complaints-data>

Relative complaints by service sector

- 3.4 In comparison with Q2 2018, the total volume of complaints per 100,000 subscribers for landline, fixed broadband and pay-TV increased, for mobile, it remained the same.
- 3.5 Figure 1 shows that fixed broadband and landline services continue to generate the highest volume of complaints per 100,000 subscribers. Ofcom continues to receive the fewest complaints about pay-monthly mobile and pay-TV services compared to the other services included in this report.

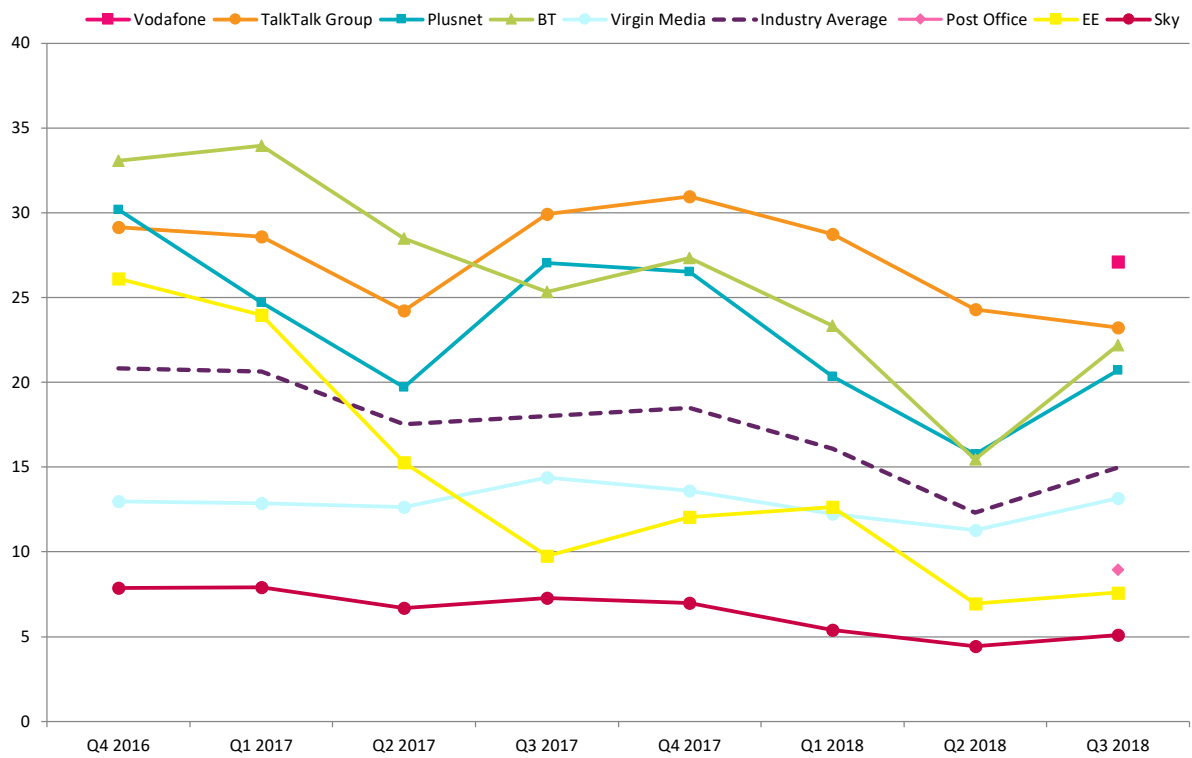
Figure 1: Relative volume of complaints per sector per 100,000 subscribers: Q1 2011 – Q3 2018, by quarter



3.6 Figure 2 shows that Vodafone generated the highest volume of complaints about fixed broadband services per 100,000 subscribers in Q3 2018, while Sky continued to generate the lowest volume of complaints per 100,000 subscribers.

3.7 In comparison to Q2 2018, Ofcom received more complaints per 100,000 subscribers about fixed broadband services.

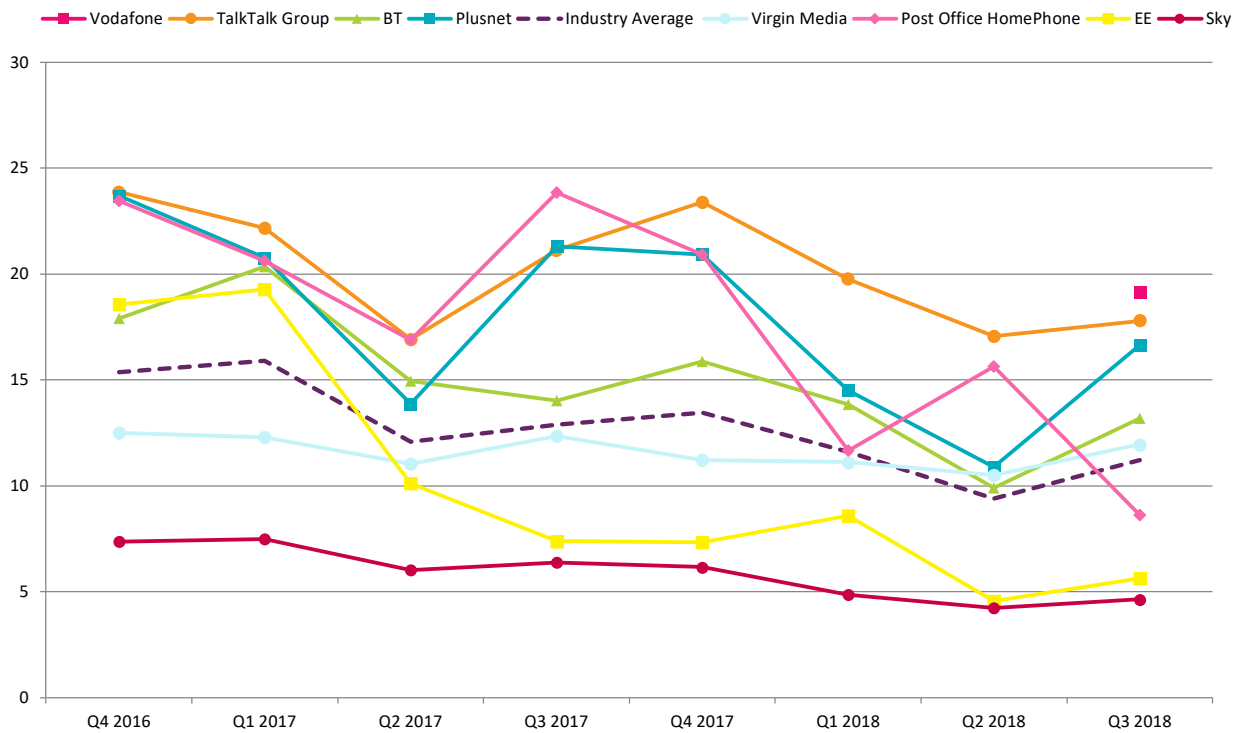
Figure 2: Fixed broadband complaints per 100,000 subscribers: Q4 2016 – Q3 2018



3.8 Figure 3 shows that Vodafone generated the highest volume of complaints about landline services per 100,000 subscribers in Q3 2018. Sky and EE generated the lowest volume of complaints per 100,000 subscribers.

3.9 Compared to Q2 2018, the overall number of complaints received about landline services, per 100,000 subscribers, decreased.

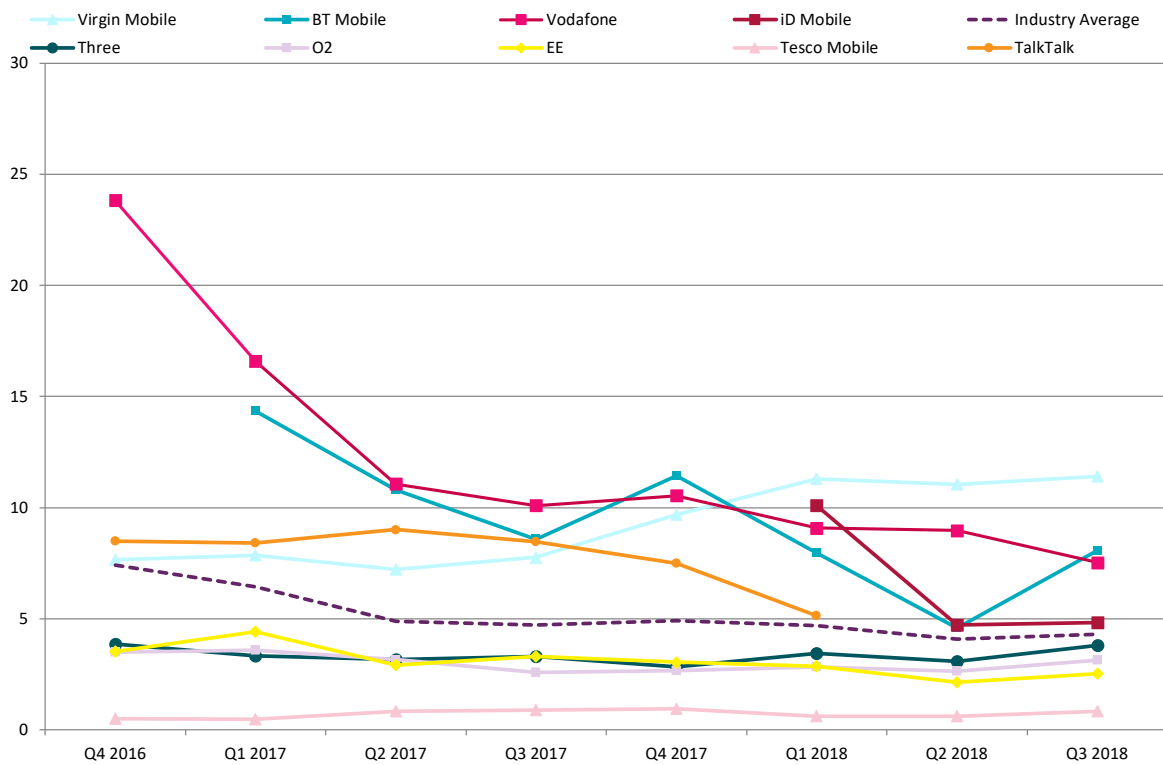
Figure 3: Landline complaints per 100,000 subscribers: Q4 2016 – Q3 2018



3.10 Figure 4 shows that Virgin Mobile generated the highest volume of complaints about pay-monthly mobile services per 100,000 subscribers in Q3 2018, while Tesco Mobile continued to generate the lowest volume of complaints per 100,000 subscribers.

3.11 Compared to Q2 2018, the overall number of complaints received about pay-monthly mobile services, per 100,000 subscribers, remained the same.

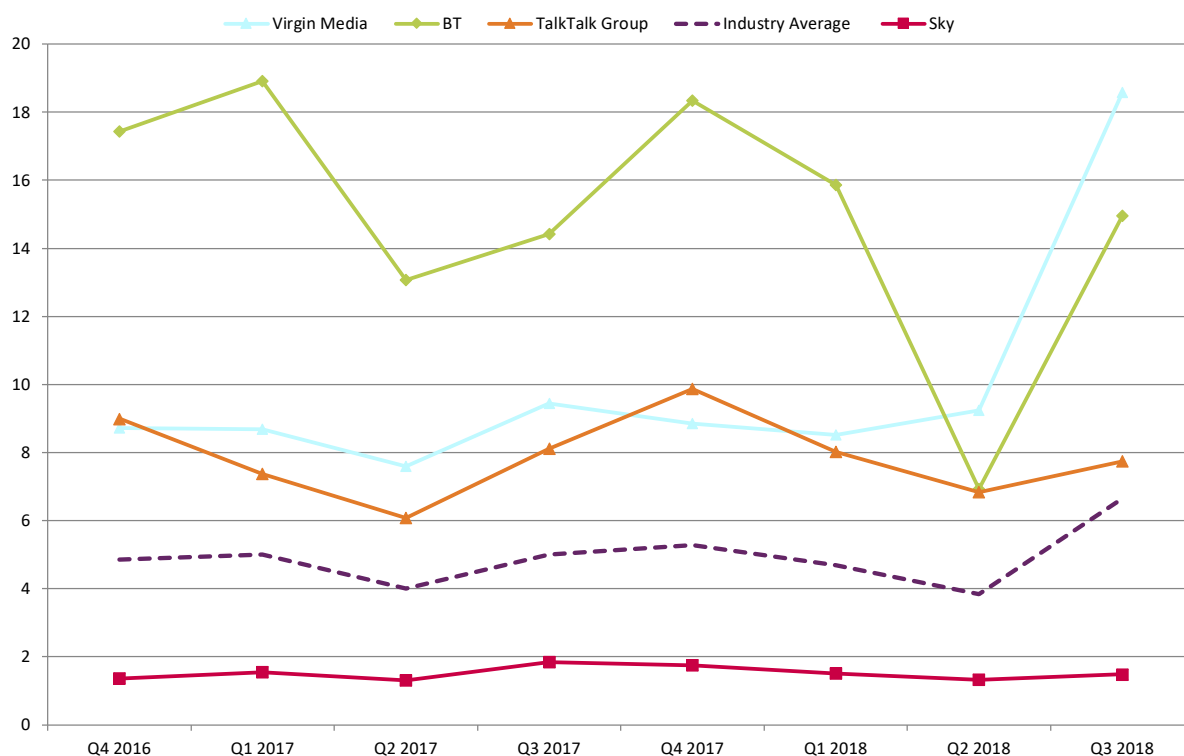
Figure 4: Pay-monthly mobile complaints per 100,000 subscribers: Q4 2016 – Q3 2018



3.12 Figure 5 shows that Virgin Media generated the highest volume of complaints about pay-TV services per 100,000 subscribers in Q3 2018, while Sky continued to generate the lowest volume of complaints per 100,000 subscribers.²⁸

3.13 Compared to Q2 2018, the overall number of complaints received about pay-TV services, per 100,000 subscribers, increased.

Figure 5: Pay-TV complaints per 100,000 subscribers: Q4 2016 – Q3 2018



²⁸ Following a restatement from Sky in November 2019, we have adjusted the Sky and industry average pay TV complaints per 100,000 subscribers figures for Q2 2018 to Q3 2018 in more recent reports. Please see the Q2 2019 report onwards for revised data. Changes to the pay TV industry average mean that in Q3 2018 the volume of TalkTalk complaints per 100,000 subscribers was comparable with the industry average.

A1. 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.²⁹ All complaints³⁰ 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.

Limitations

- A1.3 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 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 reflects the views of consumers as reported to Ofcom and the way we record them. Ofcom has sought to ensure that its data is 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) or other high-

²⁹ Refer to: <https://www.ofcom.org.uk/complain-to-ofcom>

³⁰ 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.

profile issues arise (such as network failures or where providers make changes to their services).

- 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.

Scope of the data published

- A1.4 We collect complaints data across a wide range of services - broadcasting, spectrum, telecoms and post.³¹
- A1.5 The focus of this publication is complaints made by residential³² consumers in relation to landline, fixed broadband, pay-monthly mobile telephony and pay TV services.
- A1.6 Consumers complain to Ofcom about a wide range of issues³³ 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. fixed 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.
- A1.7 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.
- A1.8 The four services covered in this publication are:

³¹ 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.

³² Ofcom records business and residential telecoms complaints separately, based on how the individual identifies their contract type when reporting the complaint.

³³ We currently record over 159 different categories of telecoms complaints.

- Fixed broadband – which includes copper-based ADSL services, cable services and fibre services;
- Pay-monthly mobile services;³⁴
- Landline - includes complaints against companies that offer both line rental and calls as well as those that supply calls only services; 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.

A1.9 For reference, landline can be provided as a combined calls and line rental service or as a call only service. As both services can generate landline complaints, Ofcom considers it is appropriate for consumers for them both to be included in the customer base used here.

Complaints about bundled services

A1.10 Many consumers choose to purchase a bundle of services from one provider (for example, landline 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.

A1.11 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.

³⁴ Mobile pay-monthly services will include complaints about use of data through a mobile handset but do not include dongles or datacards.

A1.12 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

A1.13 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 without knowing the name of the new provider.³⁵ 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

A1.14 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.

A1.15 Specifically, following a review,³⁶ from Q2 2014 onwards this report now generally includes complaints data³⁷ for those providers which, for the service being reported, have a stable market share of 1.5% or more in the relevant market.³⁸ A provider will generally³⁹ be removed from the report if, from Q2 2014 onward, its market share has dropped below 1.5% for four consecutive quarters.

A1.16 For providers included in the reporting for periods before Q2 2014, we have not retrospectively adjusted the previous generally applied publication criteria for inclusion

³⁵ 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.

³⁶ For publications up to, and including, 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 further detail.

³⁷ In the absence of exceptional circumstances, in which, should they apply, we may take a different approach.

³⁸ From time to time, new providers may join the group of those whose market share is above 1.5%. New providers will generally be added to the report after a period in which their market share has consistently been above that mark such that it should be considered a stable market share above that threshold.

³⁹ In the absence of exceptional circumstances.

(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.

A1.17 The current scope of the report encompasses the providers set out in Table 1 below. Together, these providers account for at least 90% of each market covered.⁴⁰

⁴⁰ At least 90% of market for fixed lines, 97% for fixed broadband, 97% for pay-monthly mobile telephony and 90% for pay TV.

Table 1: Providers included in this publication

Fixed broadband⁴¹	BT
	EE
	Plusnet
	Post Office
	Sky
	TalkTalk Group
	Virgin Media
	Vodafone
Pay-monthly mobile	BT Mobile
	EE ⁴²
	iD Mobile
	O2
	Tesco Mobile
	Three
	Virgin Mobile
	Vodafone
Landline⁴³	BT
	EE
	Plusnet
	Post Office HomePhone
	Sky
	TalkTalk Group
	Virgin Media
	Vodafone
Pay TV	BT
	Sky
	TalkTalk Group
	Virgin Media

⁴¹ Vodafone and Post Office have been added to the complaints table for fixed broadband, as they have reached a stable market share above 1.5%.

⁴² This includes Orange, T-Mobile and 4GEE.

⁴³ Vodafone has been added to the complaints table for landline, as it has reached a stable market share above 1.5%.

Aggregating data

A1.18 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

- A1.19 Other things being equal, the more subscribers a provider has the more complaints are likely to be made about it. 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.
- A1.20 To achieve this, we use the number of residential subscribers⁴⁴ provided to Ofcom by the operators in question. We do not collect these returns 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. If they are not in the public domain we request them from providers directly.
- A1.21 We understand from providers that quarterly subscription data is more robust than monthly data⁴⁵ and therefore we use quarterly data to calculate the complaints data.
- A1.22 The subscriber figures provided to Ofcom are the most accurate ones available for each provider, there are some differences in the methodologies which they use to compile them. In previous reports we conducted sensitivity analysis of providers subscriber figures. Ofcom has now carried out further checks on the data provided to us to ensure that it is accurate and of use to those seeking to compare providers. Our checks have shown that providers’ subscriber figures are comparable, and we have concluded that sensitivity analysis is no longer necessary. We will continue to monitor the comparability of providers’ data.
- A1.23 In our reporting of the data, in instances where there is little material difference between operator complaint levels, for example an absolute difference between providers complaints per 100,000 subscriber figures of less than 1, we treat their performances similarly.

⁴⁴ Note that it is possible for an individual to have more than one subscription.

⁴⁵ Particularly where the quarterly data is reported externally.

Approach to provider subscriber figure adjustments

A1.24 Occasionally, providers re-submit their subscriber figures after publication of one of our complaints reports. For example, where it finds the data it gave us was incorrect. If a provider subsequently resubmits its subscriber figures, Ofcom will not usually adjust historic data unless the discrepancy has a significant impact on the results.

The industry average line

A1.25 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%.