

## Communications Consumer Panel and ACOD's response to Ofcom's consultation on Mobile phone repeaters: Proposed changes to the Wireless Telegraphy Regulations 2022

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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 believe that consumers, citizens and micro-businesses need access to basic, secure, affordable, reliable, resilient communications services that are both accessible and usable across a variety of devices. Improving indoor mobile coverage is a vital component to achieving reliable communications services.

We welcome the opportunity to input into this consultation by Ofcom, to provide a consumer, citizen and micro-business voice that is much-needed in any debate around policy that affects digital connectivity, but may not be heard, given the technical description of the consultation.

As with any Ofcom consultation, we hope that Ofcom has taken the opportunity to consult widely and has proactively sought out those who may be negatively impacted by the courses of action that could be taken, so that it has tested its thinking before risking exposing consumers, citizens or micro-businesses to unintended harm.

We support Ofcom's decision not to revert to an outright ban of mobile repeaters - as we said in our response to Ofcom's previous consultation, "We welcome the proposals outlined in the consultation - extending the range of repeaters available for people to buy and install without a licence will provide consumers, citizens and micro-businesses with additional connectivity solutions to improve indoor mobile coverage. We hope that the proposals will help to drive competition in the mobile repeaters market and promote competitive pricing that consumers can benefit from. We note that compliant repeaters are (were) currently significantly more expensive than non-compliant repeaters available on the UK market, so we consider driving down costs to consumers - who may be unaware of the compliance regime - an important benefit and protective measure. This is particularly important where the Covid-19 pandemic has resulted in many consumers, citizens and micro-businesses suddenly becoming financially vulnerable yet increasingly reliant on reliable digital connectivity."<sup>1</sup>.

We also welcomed Ofcom's proposal to work with relevant industry partners to develop a voluntary testing standard and to publish a list on the Ofcom website of static indoors mobile repeaters that are compliant with Ofcom's requirements. We advised that making consumers, citizens and micro-businesses aware of connectivity solutions available to them is paramount to improving coverage across the UK - including a list of compliant mobile repeaters on Ofcom's website will allow consumers to refer to a trusted source, without fear of being duped or scammed.

We believe the same applies to any change in regulatory requirements that may affect consumer, citizen and micro-business safety.

We have raised with Ofcom - over some time - our concerns around migrating from analogue to all-IP telephone networks and of the retirement of 2G and 3G frequencies, particularly with reference to consumers, citizens and micro-businesses in rural and remote areas, and those reliant on services that would use networks that will no longer be available.

It is not - in our view - acceptable to remove access to services that consumers, citizens and micro-businesses rely on without providing them with a safety net.

We would urge Ofcom to ensure that removal of any requirement to serve 2G and 3G frequencies is in line with the end date of those frequencies' mobile connectivity in the UK, so that consumers who are able to access those frequencies to the end of that timeline are not left unsupported before 4G or 5G networks reach them - and that those using mobile repeaters are made aware of the change early on, with time to take any necessary action, including investigating other connectivity options.

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<sup>1</sup> [ccp-and-acod-response-to-ofcoms-consultation-on-mobile-phone-repeaters.pdf](https://communicationsconsumerpanel.org.uk/ccp-and-acod-response-to-ofcoms-consultation-on-mobile-phone-repeaters.pdf)  
([communicationsconsumerpanel.org.uk](https://communicationsconsumerpanel.org.uk))