

## OFCOM 2016/17 Draft Annual Plan

The ACS has had the opportunity to offer feedback on the Annual Plan at various stages, and welcomes the changes already made in response to our feedback. We would like to offer the following further comments on the current version of the Plan:

- (1) In the section about the nations and regions, there is no reference to how the role of the nations and regions might be enriched in Ofcom decision making. The ACS considers that in Paragraph 4.5 there should be an additional statement along the lines that “in the context of the evolving constitutional arrangements of the UK, Ofcom will commit to a continuing examination of how the voice of the nations and regions of the UK can be enriched within Ofcom policy development and decision making.”
- (2) There is no reference to the use of repeaters in improving signal quality in remote areas. This was raised as a key issue at the Connected Nations stakeholder event Ofcom recently held in Edinburgh. The ACS considers that it would be beneficial to have a commitment within the plan to explore with the industry, and promote within the EU, the development of repeaters, and their use in ways compatible with legal requirements, in an effort to further the delivery of services where that could have a beneficial impact to the remotest rural areas.
- (3) On Openreach quality of service, the ACS considers there should be a specific focus on the performance of Openreach in remote and rural areas. For example in Section 3, at the end of Paragraph 3.16, “OFCOM will also monitor Openreach consultation and co-operation with remote and rural communities, with the aim of encouraging improved coverage and quality of service.”
- (4) Specifically, the ACS suggests the following changes to Para 4.2 and 4.3 on Page 9:
  - 4.2 The provision of postal, mobile and broadband services to rural areas presents particular challenges, given their economic geography. These areas fall disproportionately within Northern Ireland, Scotland and Wales as well as some English regions. Good quality communications services are critical to consumer experiences, citizen participations and access **to public services**, and to SME success in rural communities.
  - 4.3 In 2016/17 Ofcom will continue its review of the Royal Mail, including the parcel market and parcel surcharging in the **Scottish Highlands and Islands** and Northern Ireland.....

ACS  
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