



Telecoms and Pay
TV Complaints
Q1 (January to March) 2013

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Section 1

Executive summary

- 1.1 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.
- 1.2 On average, Ofcom receives just under 300 telecoms complaints a day from consumers.¹ Such complaints are likely to be made where a consumer has been unable to resolve an issue with their provider to their satisfaction. We keep a record of these complaints by service and by provider, and believe that such information is useful for consumers; for example, this data may be relevant to those considering a new service or provider. We note that provider-specific information is also available to guide consumers in areas such as financial services and energy.
- 1.3 This is the latest edition in a series of quarterly complaints publications.² We previously published data for each quarter between October 2010 and December 2012.³ This publication now provides data for the quarter January 2013 to March 2013.
- 1.4 There are 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 will only provide a partial picture of complaints relating to any provider.
 - The complaints data reflects the views of consumers as reported to Ofcom. 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 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).
- 1.5 The next publication will include data for the period April to June 2013 and is expected to be published in September 2013.

¹ Ofcom received 102150 complaints in 2011/12. Ofcom 2011/12 Annual Report, page115.
<http://www.ofcom.org.uk/files/2012/07/OfcomAnnualReport11-12.pdf>

² Previous editions can be found at <http://stakeholders.ofcom.org.uk/market-data-research/telecoms-research/complaints/?a=0>

³ Pay TV complaints were first published from October 2011 (i.e. from Q4 2011).

1.6 Stakeholders should consider both the monthly and quarterly data carefully when comparing providers' performance. This publication only includes complaints data for providers with a market share of 4% or above and those which regularly generate more than 30 complaints per month. As providers vary in size we publish complaints as a proportion of subscribers.⁴ Presenting the complaint numbers in this manner ensures that meaningful comparisons can be made between the data for each provider.

1.7 The main findings for the current reporting period (Q1 2013) are as follows:

- Overall Complaints:⁵ The total volume of complaints fell slightly. Broadband services generated the highest relative number of complaints compared to the other services featured in this report, with the fewest complaints made about mobile 'pay-as-you-go' (PAYG) services.
- Fixed line telephony: The providers covered here are BT Retail, Sky, TalkTalk Group and Virgin Media. TalkTalk Group generated the highest relative volume of complaints and these related to service faults and customer service issues. BT was also above the industry average whilst Virgin Media received fewer complaints than the other fixed line providers that we report on.
- Fixed broadband: The providers covered here are BT Retail, Sky, TalkTalk Group, Virgin Media and Orange/EE.⁶ Orange/EE generated the largest relative volume of complaint and these related to changing provider and service issues. TalkTalk Group and BT also generated above industry average complaint levels whilst Virgin Media received fewer relative complaints than the other fixed broadband providers that we report on.
- Mobile pay-monthly telephony (excluding mobile broadband datacards and dongles): Removed whilst data checks are conducted.
- Mobile PAYG telephony: None of the providers that we report on generated an average of 30 complaints or more a month over this quarter. We therefore maintain our position of not publishing provider specific data for this service.
- Pay TV services: The providers covered here are Sky, BT Vision, and Virgin Media. Ofcom received fewest complaints over the quarter about Sky and the most complaints about BT Vision. Complaints about BT Vision were partly driven by service issues. Virgin Media also generated above industry average complaint levels.

⁴ Complaints are displayed per 1000 customers. This enables the providers to be compared on a like-for-like basis.

⁵ Pay-monthly mobile data has been removed whilst data checks are conducted.

⁶ We have reported on Orange and EE as a combined provider as Orange's existing fixed broadband customers are being transitioned onto 'EE' products.

Section 2

Introduction

Background

- 2.1 Consumers' overall level of satisfaction with communications services is around 90%.⁷ Where concerns arise, consumers typically raise their complaint with their provider in the first instance.⁸ If the provider is not able to resolve the complaint within eight weeks, the consumer can make an application to an independent Alternative Dispute Resolution (ADR) scheme. The ADR scheme can examine the complaint and reach a judgement on the issue.⁹
- 2.2 In addition, some consumers choose to contact Ofcom due to our role as regulator of communications services. While we do not resolve individual complaints, we offer advice on how best to resolve the issues that are raised.¹⁰ We also use the complaints data to inform policy enforcement work as well as related monitoring activities. On average, we receive just under 300 consumer complaints a day.

Why publish provider-specific complaints?

- 2.3 For some time now Ofcom has published telecoms complaints data by key issue in our Telecoms Complaints Bulletins¹¹ and Consumer Experience reports.¹² These publications show the monthly complaints that Ofcom receives in areas such as mis-selling, silent calls and broadband speeds.
- 2.4 Since April 2011 we have published quarterly Ofcom complaints data by provider. Complimentary to this report, we also regularly publish research on 'customer service satisfaction' on a provider-specific basis.¹³
- 2.5 The publication of performance data like this is consistent with our statutory duty of 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.¹⁴ The absence of key information can lead to poor purchasing decisions. Therefore, if key information is not

⁷ Source: Ofcom, *The Communications Market 2012*, Figure 1.11, page 32.

http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr12/CMR_UK_2012.pdf

⁸ 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

⁹ Ofcom requires all CPs to be a member of an approved ADR scheme. Ofcom carried out a Review of Consumer Complaints Procedures - the statement is available at

<http://stakeholders.ofcom.org.uk/consultations/adr-review-12/statement>

¹⁰ We have also recently updated our website to further assist consumers with their complaints. Refer to <http://consumers.ofcom.org.uk/tell-us/>

¹¹ Available at <http://stakeholders.ofcom.org.uk/enforcement/telecoms-complaints-bulletin/>

¹² Available at <http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience/>.

¹³ <http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/customer-service.pdf>

¹⁴ In line with Section 26 of the Communications Act 2003, Ofcom may arrange for the publication of information and advice for consumers.

readily available or unclear there may be a case for Ofcom to intervene in the interests of consumers.

- 2.6 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, much of our focus to date has been on improving the information available to consumers in these areas. Examples include publication of broadband speeds research¹⁵ and our scheme for accrediting price comparison calculators.¹⁶
- 2.7 However, our prior research has also suggested that at least a fifth of consumers in each market would be likely to use comparative information about complaints. Those consumers who are actively considering switching provider are most likely to say they would use such information.¹⁷
- 2.8 In addition, publication of provider-specific complaints data may act as an incentive for providers to improve their performance.¹⁸ Similar information is also available to guide consumers in a number of other sectors, in particular financial services¹⁹ and energy sectors.²⁰
- 2.9 While our complaints data has a number of important limitations (refer to Section 3), we believe that this data, along with other information,²¹ can be informative for consumers seeking to compare providers.²² We also observe that this data is of interest to intermediaries such as consumer groups, journalists and price comparison sites who advise consumers.
- 2.10 This transparent approach is consistent with the Government's consumer empowerment strategy²³ which argues that publishing complaints data is "a good way of encouraging businesses to improve their performance without the need for heavy-handed legislation, as no company wants to be last in an indicator of performance or customer satisfaction".

¹⁵ Available at <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/broadband-speeds/?a=0>

¹⁶ See <http://stakeholders.ofcom.org.uk/consultations/ocp/statement/pricescheme/?a=0>

¹⁷ According to Ofcom research collected in 2008. See <http://stakeholders.ofcom.org.uk/binaries/consultations/qos08/statement/qos.pdf>

¹⁸ 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

¹⁹ http://www.fsa.gov.uk/pages/Library/Other_publications/commentary/index.shtml

²⁰ See <http://energyapps.consumerfocus.org.uk/performance/>

²¹ For example information on price, speed, coverage, contract terms and so on.

²² 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/

²³ Better Choices: Better Deals, Consumer Powering Growth, *BIS & the Cabinet Office*, 13 April 2011

Provider-specific complaints data

2.11 This is the ninth report to include Ofcom telecoms complaints data by provider, and the fifth to include complaints data about Pay TV services. The methodology used here is set out in Section 3.

Section 3

Methodology

Introduction

- 3.1 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.²⁴ All complaints²⁵ 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.
- 3.2 In this section we outline the approach we have taken to publication of our complaints data.

Scope of the data published

- 3.3 We collect complaints data across a wide range of services - broadcasting, spectrum and telecoms.²⁶ Total complaints in each of these areas are published in our annual Consumer Experience reports.²⁷
- 3.4 The focus of this publication is on complaints made by residential²⁸ consumers in relation to fixed line telephony, fixed broadband, mobile telephony and Pay TV.
- 3.5 Consumers complain to Ofcom about a wide range of issues²⁹ so we have had to consider carefully what level of data would be useful and robust enough for publication. In view of the complexity, our current position is that we should only publish complaints data by service rather than by detailed category of complaint for each service.
- 3.6 The five services 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 super-fast broadband;

²⁴ Refer to <http://consumers.ofcom.org.uk/tell-us/telecoms/>

²⁵ 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.

²⁶ 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.

²⁷ Refer to Ofcom's annual Consumer Experience Reports - <http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/>

²⁸ Ofcom records business and residential telecoms complaints separately, based on how the individual identifies themselves when reporting the complaint.

²⁹ We currently record over 159 different categories of telecoms complaints. The system of complaint categorisation was changed at the beginning of April 2012. This change has no impact on the presentation of results in this or previous publications as the results are presented as much higher level (by provider and by sector).

- Pay-monthly mobile services;^{30 31}
- PAYG mobile services; and
- Pay TV - includes complaints relating to access to the service and 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

- 3.7 Today 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 reported to us.
- 3.8 The approach we have taken when recording complaints received from customers 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 customer 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 equally 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.
- 3.9 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 against unknown providers

- 3.10 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.³² In these circumstances Ofcom refers the case to Openreach to find out recent activity on the line, including applications and 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.

³⁰ Mobile pay monthly and mobile PAYG services will include complaints about use of data through a mobile handset but do not include dongles or datacards.

³¹ Section removed whilst data checks are conducted.

³² Their existing provider would not have visibility of the new provider either, they will only be aware that a request has been made to take over the service.

Focus on the largest providers

- 3.11 Ofcom records complaints received against any provider in the UK. The size of each individual provider varies greatly, as does the number of complaints received.
- 3.12 The lower the number of complaints, the greater potential there is for the data to be affected by small fluctuations. It is less likely that robust and comparable data can be drawn from a small sample size. This is important when trying to identify and assess trends in the data.
- 3.13 Therefore, to minimise distortion and allow robust statistical analysis, we only publish complaints data against those providers which, for the service being reported:
- i) have a market share of 4% or more in the relevant market; and
 - ii) regularly generate at least 30 complaints per month.
- 3.14 This encompasses the providers set out in Table 1 below. Together, these providers account for over 85% of each market covered.³³

³³ At least 92% of market for fixed lines, 89% for fixed broadband, 90% for pay monthly mobile telephony 85% for PAYG mobile telephony and 90% for pay TV.

Table 1: Providers included in this publication

| | |
|---|------------------------------------|
| Fixed Line Telephony and Fixed Broadband | Sky |
| | BT Retail ³⁴ |
| | Orange Home (Fixed Broadband only) |
| | TalkTalk Group ³⁵ |
| | Virgin Media |
| Mobile Pay Monthly³⁶ | 3UK |
| | O2 |
| | Orange |
| | T-Mobile |
| | Virgin Mobile |
| | Vodafone |
| Mobile PAYG | Three UK |
| | O2 |
| | Orange |
| | T-Mobile |
| | Tesco Mobile |
| | Vodafone |
| Pay TV | BT Vision |
| | Virgin Media |
| | Sky |

³⁴ Any complaints received against Plusnet have not been included with complaints against BT Retail.

³⁵ This includes TalkTalk and Tiscali UK.

³⁶ Section removed whilst data checks are conducted.

Complaints as a proportion of subscribers

- 3.15 In general, the more customers 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 customer base to put complaints numbers into context and to help ensure the data is more meaningful for consumers.
- 3.16 To achieve this we have used the number of connections³⁷ from each individual provider collected by our Market Intelligence team. We do not collect this data for Pay TV providers and so, to calculate Pay TV complaints per thousand customers, we use customer data from the providers' own published investor reports. Sky, Virgin Media and BT all publish Pay TV subscription data on a quarterly basis (as part of their updates to investors).
- 3.17 We understand from providers that quarterly connection data is more robust than monthly data³⁸ and therefore only use quarterly data to normalise the complaints data.
- 3.18 Ofcom is aware that different providers may take different approaches to recording connection numbers, particularly if they offer PAYG mobile services. This is because some providers may keep inactive customers on their books for longer than others. To help ensure a standard approach is taken, Ofcom's Market Intelligence team defines active subscriptions as those with any registered activity within the last 90 days.³⁹
- 3.19 Fixed line telephony can be provided as a combined calls and line rental service or as a calls 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.

The industry average line

- 3.20 As an additional incentive for providers to improve their performance we include an industry average line showing the average of the number of complaints in the published data for each service.⁴⁰

Sensitivity Review

- 3.21 Prior to the publication of our initial report, Ofcom reviewed its complaints data to identify issues that might be unique to one or a limited number of providers but which are outside the control of those providers. The presence of such issues may distort the complaints data by introducing biases against individual providers or different groups of providers. We found that although these issues do exist their impact is unlikely to result in a material bias against particular providers in the context of the

³⁷ Note that it is possible for an individual to have more than one connection.

³⁸ Particularly where the quarterly data is reported externally.

³⁹ This definition was adopted following discussions held with industry when Ofcom began collecting the data.

⁴⁰ We are using a 'weighted average' that adjusts for comparative size of operator. The scope of the 'industry' is limited to those providers featured in this report rather than including smaller providers who have lower than 4% market share.

data we are publishing.⁴¹ Also, the time sequence of results over time will tend to smooth the effect of any such issues.

⁴¹ Our approach for assessing the potential impact of these issues is outlined at Annex 1 of the following report: <http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/complaints/oct-2010-feb-2011.pdf>

Section 4

Telecoms and Pay TV Complaints

Introduction

- 4.1 This section sets out the complaints data from October 2010 to March 2013. We believe that used in conjunction with other available information this provides helpful and meaningful information for consumers. It also gives an incentive for providers to improve their performance.
- 4.2 As mentioned above, it is worth bearing the following limitations in mind when considering this data:
- The data only covers complaints that consumers have chosen to report to Ofcom and, therefore, it does not represent total complaints that consumers have made to their providers or to other agencies (e.g. Alternative Dispute Resolution schemes). As such it can only provide a partial picture of complaints relating to any provider.
 - The complaints data reflects the views of consumers. Ofcom has sought to ensure that its data accurately reflects the complaint that has been made, but we do not check the veracity of individual complaints.
 - Contact with Ofcom may reflect the relative quality of complaints handling services, as well as the quality of service received. Given this, providers with poor complaints handling processes may feature more prominently than those with better 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).
- 4.3 The data published here is presented on a quarterly basis (Q4 2010 to Q1 2013) and also monthly (October 2010 to March 2013). The next publication will contain data for Q2 2013 (April to June) and will be published in September 2013.
- 4.4 This publication only includes charts for complaints data from providers who: (i) have a market share of 4% or more in the relevant market; and (ii) consistently generate at least 30 complaints per month. This is the minimum figure required that will support meaningful comparison between providers.

Relative complaints by service sector

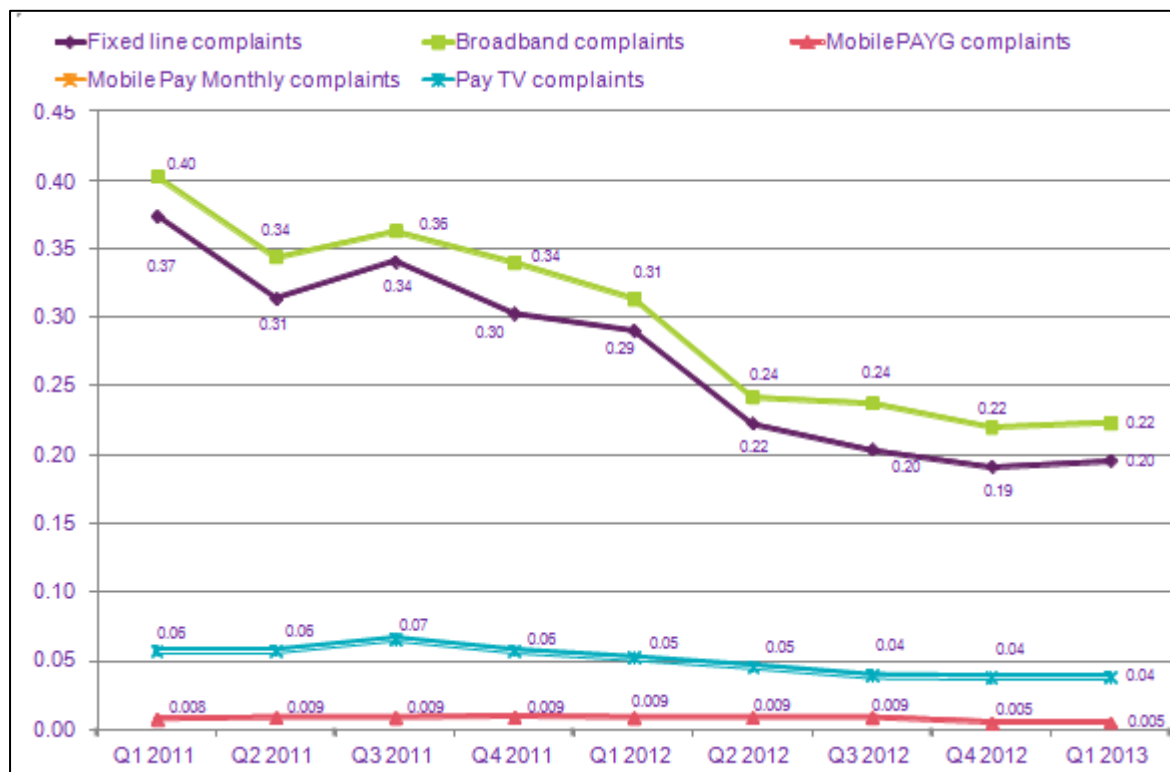
- 4.5 The following figures show the residential consumer complaints that Ofcom received across fixed line, broadband, PAYG mobile, pay monthly mobile⁴² and Pay TV services between October 2010 and March 2013 inclusive.⁴³ The information is presented per 1000 customers/connections for the period covered, by month and by quarter.

⁴² Figures removed whilst data checks are conducted.

⁴³ As mentioned earlier, Pay TV is reported only from October 2011 (Q4 2011) onwards.

- 4.6 Figure 1 shows that broadband services generate the highest number of complaints. Ofcom continues to receive 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 1000 customers/connections: Q1 2011 – Q1 2013, by quarter ⁴⁴

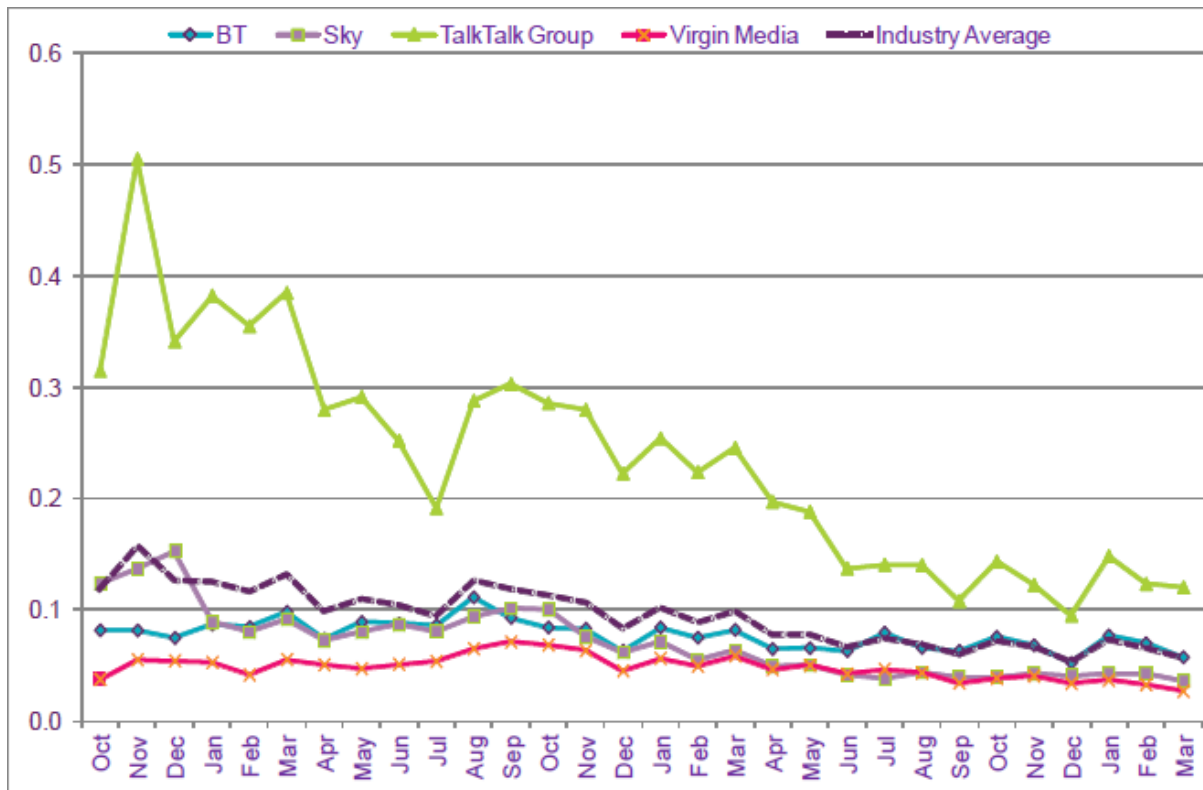


Fixed line telephony complaints

- 4.7 The following figures show the residential consumer complaints that Ofcom received against the four largest providers of fixed line telephony services between October 2010 and March 2013 inclusive. The information is presented per 1000 customers/connections with both monthly and quarterly charts.
- 4.8 Figure 2 and Figure 3 show that TalkTalk generated the highest number of complaints. These complaints related to service faults and customer service issues. BT also generated above industry average complaint levels this quarter. Virgin Media received the least complaints compared to the other fixed line providers in the report.

⁴⁴ Pay monthly mobile figures removed whilst data checks are conducted.

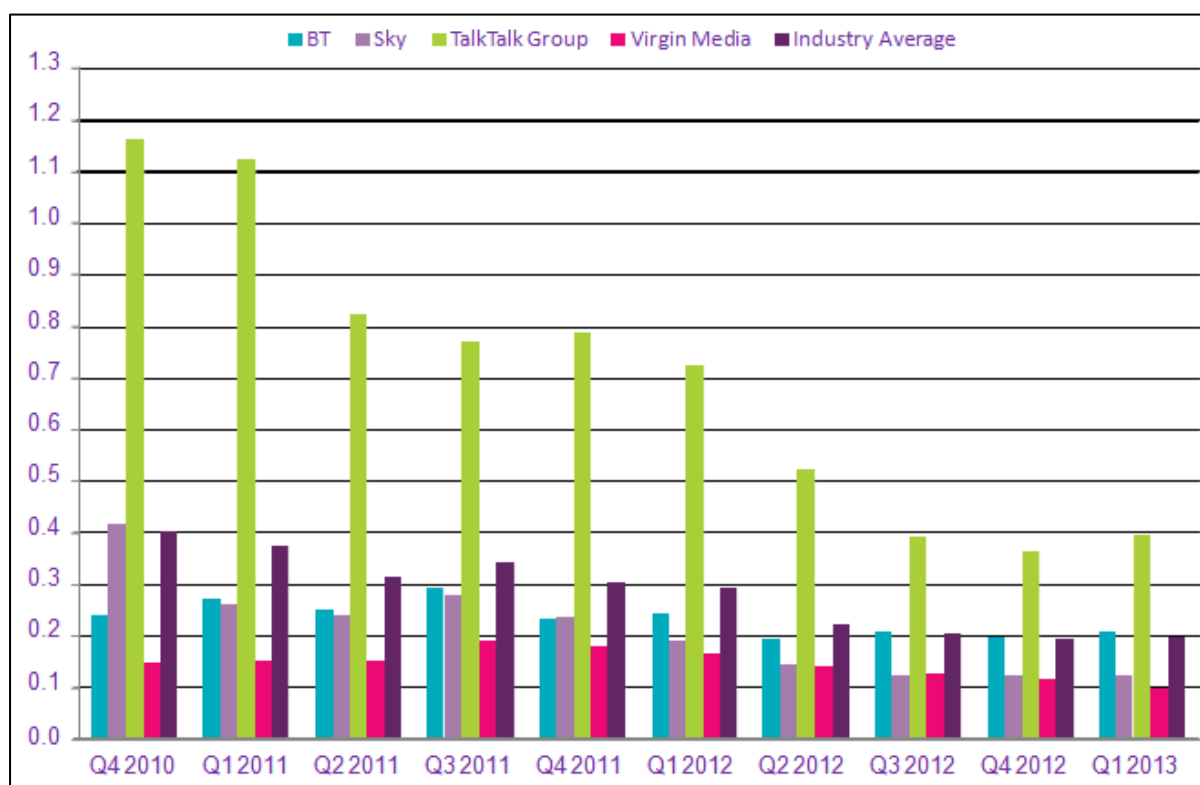
Figure 2: Fixed line complaints per 1000 customers/connections: October 2010 – March 2013, by month



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

Source: Ofcom, CCT data; fixed line providers

Figure 3: Fixed line complaints per 1000 customers/connections: Q4 2010 – Q1 2013, by quarter



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

Source: Ofcom, CCT data; fixed line providers.

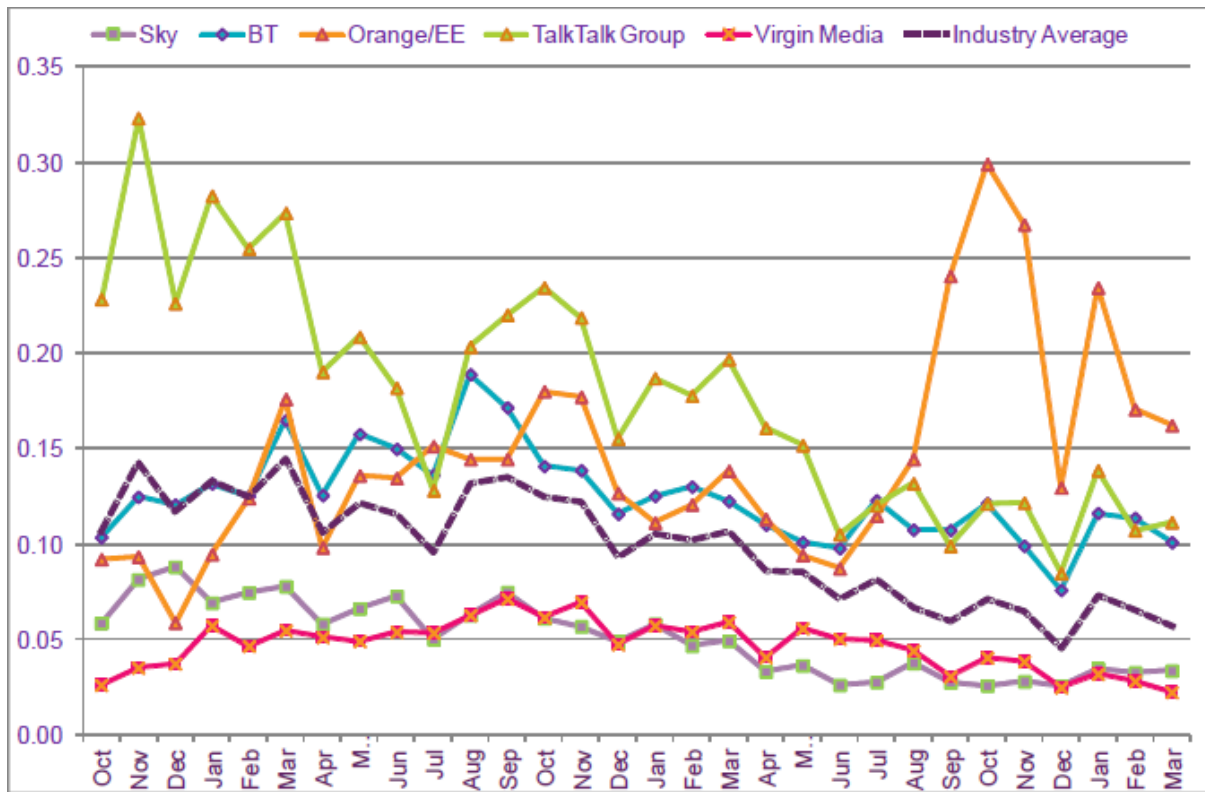
Fixed broadband complaints

- 4.9 The following figures show the residential consumer complaints that Ofcom received against the five largest providers of fixed broadband services between October 2010 and March 2013.⁴⁵ The information is presented per 1000 customers/connections for the period covered, by month and by quarter.
- 4.10 Figures 4 and 5 show that Orange/EE⁴⁶ generated the most complaints and these appear to be related to consumers changing provider and service issues. TalkTalk and BT also generated above industry average complaint levels this quarter. Virgin Media received fewer complaints than the other providers in the report.

⁴⁵ From April 2011 onwards the market share threshold for inclusion was reduced from 5% to 4%.

⁴⁶ We have reported on Orange and EE as a combined provider as Orange's existing fixed-broadband customers are being transitioned onto 'EE' products.

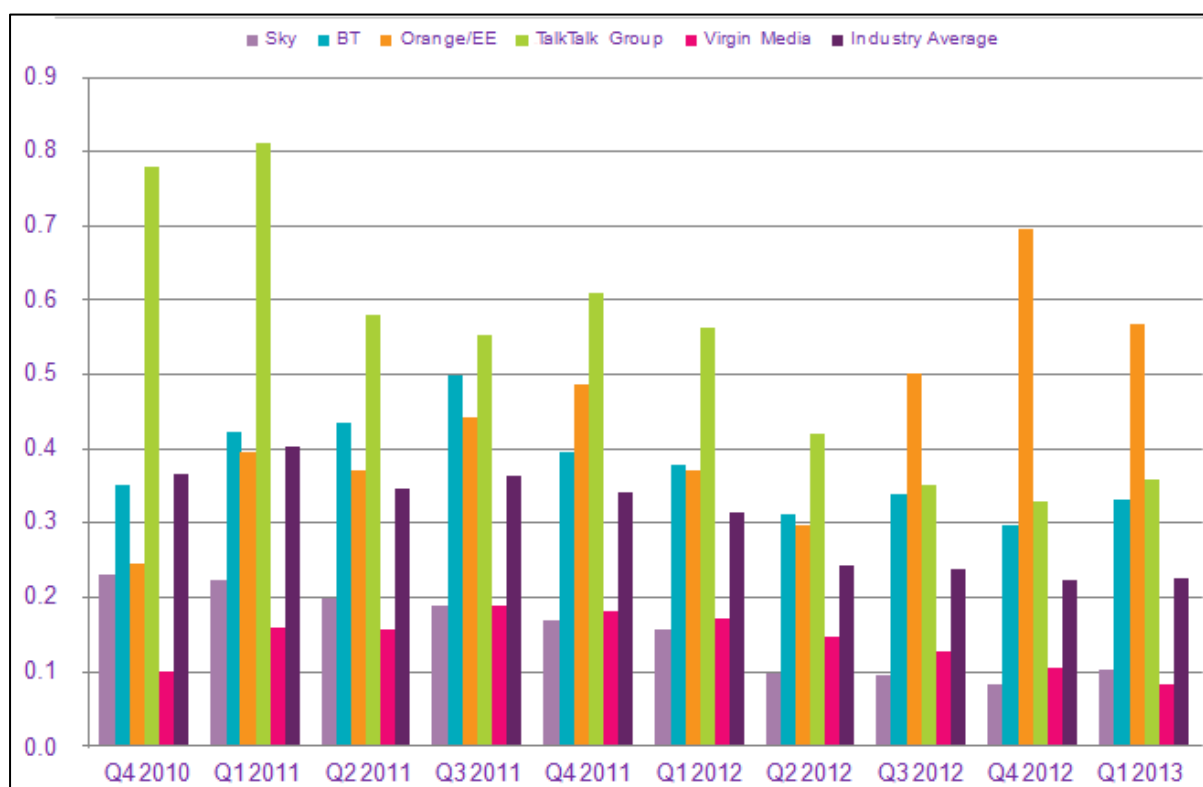
Figure 4: Fixed broadband complaints per 1000 customers/connections: Oct 2010 – March 2013, by month



Industry average is limited to those providers included in the report

Source: Ofcom, CCT data; fixed broadband providers

Figure 5: Fixed broadband complaints per 1000 customers/connections: Q4 2010 – Q1 2013, by quarter



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

Source: Ofcom, CCT data; fixed broadband providers

Mobile telephony complaints

4.11 In this section of the report we publish complaints information for mobile pay monthly and PAYG services.

Pay Monthly complaints

4.12 Section removed whilst data checks are conducted.

PAYG Complaints

4.13 Approximately 95% of mobile complaints received by Ofcom are from pay monthly customers, and consequently we receive relatively few complaints per provider for PAYG services. Over the previous 12 months, no provider has consistently received more than 30 complaints per month.

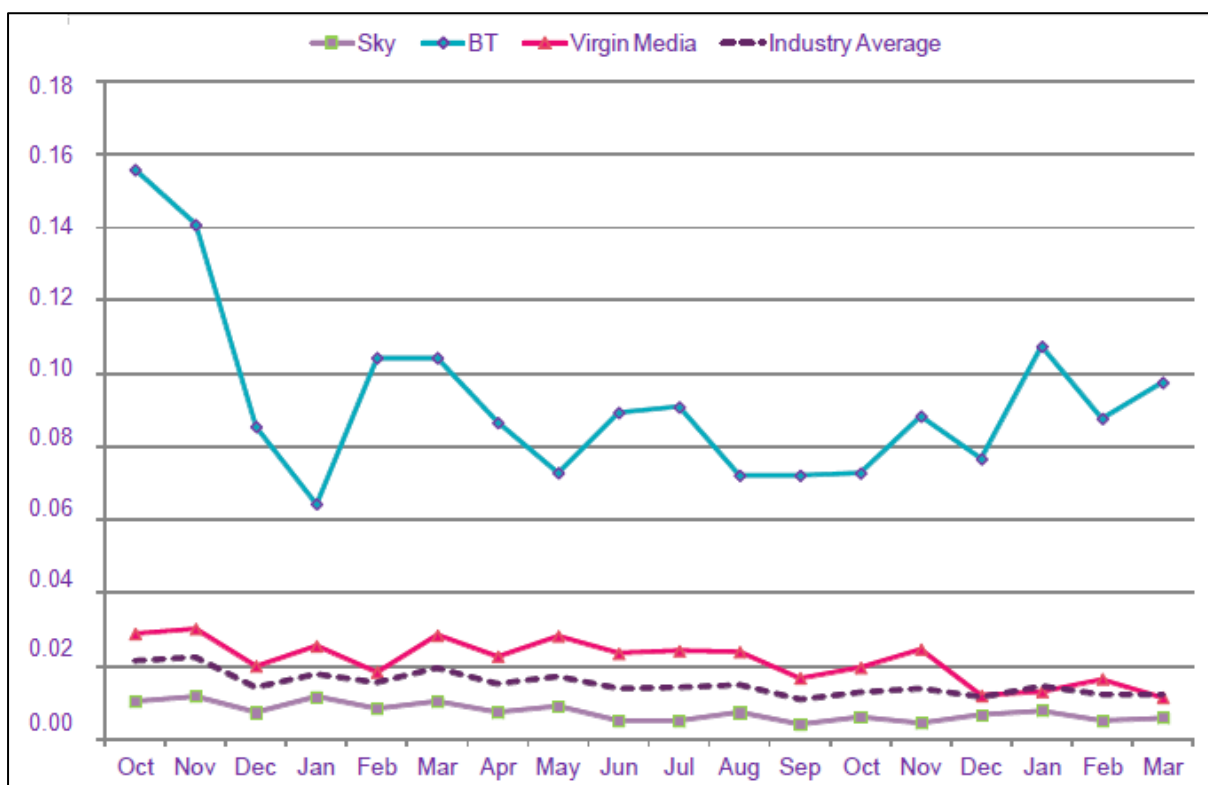
4.14 As discussed earlier in this report, the lower the number of complaints the greater potential there is for the data to be affected by small fluctuations and so it is less likely that robust and comparable data can be drawn from a small sample size. To minimise distortion and allow statistical analysis, we have an existing policy of only publishing complaints data against those providers which (for the service being reported) regularly generate at least 30 complaints per month.

Pay TV Complaints

4.15 The following figures show the residential consumer complaints that Ofcom received against the three largest providers of Pay TV services between October 2011 and March 2013. The information is presented per 1000 customers/connections for the period covered, by month and by quarter.

4.16 Figures 8 and 9 show that Ofcom received fewer complaints over the period in question about Sky compared with the other two providers, while it received the most complaints about BT Vision. Complaints about BT Vision generally related to service provision issues. Virgin Media also generated above industry average complaint levels over the period.

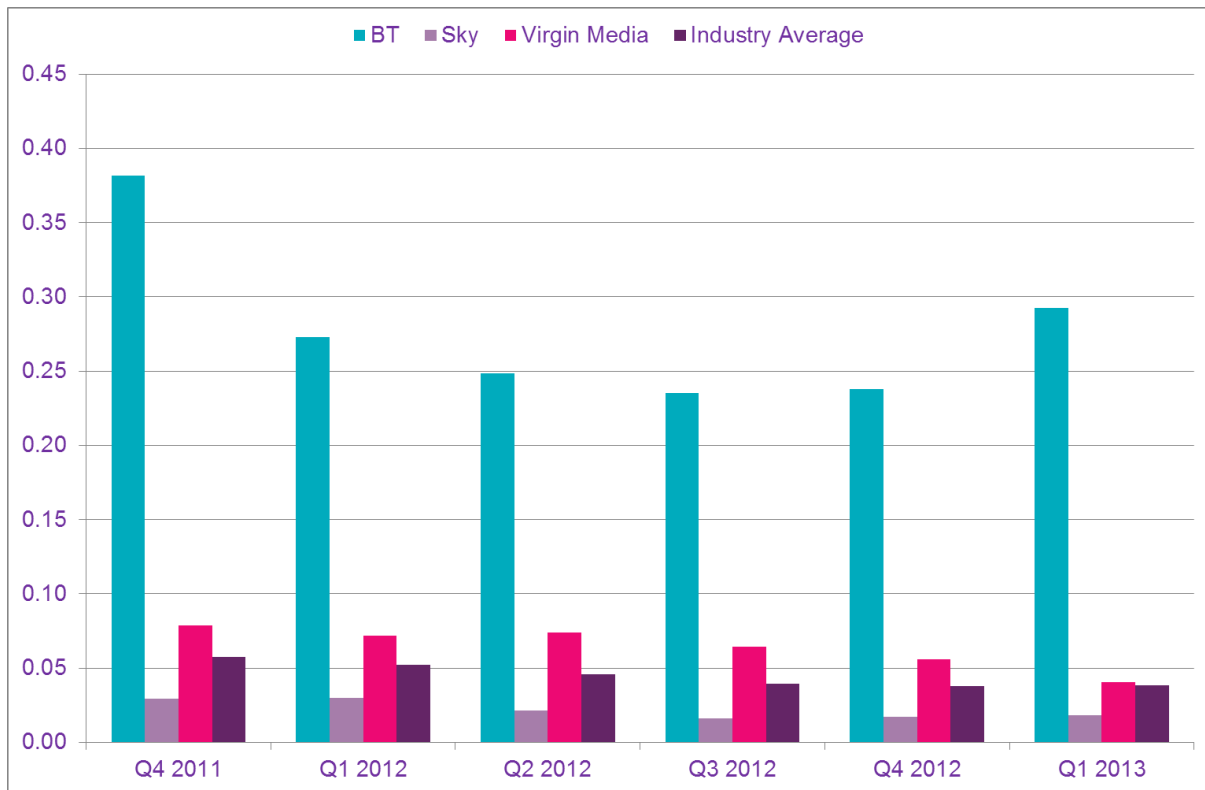
Figure 6: Pay TV complaints per 1000 customers/connections, October 2011 – March 2013, by month



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

Source: Ofcom, CCT data; providers' published reports

Figure 7: Pay TV complaints per 1000 customers/connections: Q4 2011 – Q1 2013, by quarter



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

Source: Ofcom, CCT data; providers' published reports