### **Organisation** (if applicable):

uSwitch.com

#### **Additional comments:**

# Question 1: Are there areas of Ofcom's overall strategic approaches and purposes, outlined in last years' annual plan that may need to change?:

We believe that Ofcom's overall strategic approaches and purposes do not need to change. The key areas identified in the previous annual plan remain equally, if not more, important than before.

It is vital that Ofcom continues to act in the interests of consumers - and brings in any consumer-friendly regulation as quickly as possible. We have seen instances of this recently, such as the guidance on fixed prices in contracts, but would like to see more consumer protection and empowerment policies implemented.

Switching should remain a priority - but this should come hand-in-hand with education and information. Switching can help consumers save money, but it's vital that they move to the best deal for them - and this should be an informed decision.

Therefore, promoting informed choice is vital if consumers are to be able to engage effectively with the market. While the market is highly competitive - especially in broadband - we feel that more needs to be done to ensure consumers have all the information they need to make the right decisions for them. Therefore, we would urge Ofcom to look again at our proposals to introduce Annual Statements and contract end date reminders.

Of commust also ensure that competition continues to thrive - especially in the face of any potential growing brands/ mergers.

## Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2014/15?:

## Question 3: Are there any specific areas for deregulation or simplification in the coming year?:

Consumer empowerment is key to engagement in the market, which will help consumers save money in the long run. Empowerment can be achieved through better education, improved transparency in the market and projects like Annual Statements. These hit a number of broader areas of consumer concern - education, transparency and empowerment. They are all about giving consumers access to useful information that will help them engage with the market and make it work for them.

Following the announcement that consumers will be able to leave contracts without a penalty if providers put prices up, Annual Statements are even more important. We'd hope that this move deters providers from implementing a price hike mid-contract, but this could see them put prices up as soon as the consumer is out of contract. If this happened, it would be even more vital that consumers were made aware, as clearly as possible, when their contract ended and what the new projected bill would be.

In order for consumers to understand their bills, engage in the market and save money, there needs to be transparency. We believe that more needs to be done around this - such as reminder letters when contracts end/ intro offers finish. Annual Statements would also help highlight any changes in pricing following the end of intro offers

Consumer education is more of an easy win for Ofcom. Instead of passing regulation/legislation, Ofcom can embark on a programme of consumer education. uSwitch.com can play a key part in supporting this through work like our broadband guides and research on consumer concerns about the market.

In terms of market specific priorities, we believe there are a number of areas of concern for both the mobile sector and broadband sector- and would urge Ofcom to address them as a priority:

#### Mobiles:

Preparing Brits for higher than expected bills - not just when roaming. We would ask that providers send text warnings when Brits are hitting limits of calls / data. There should also be more messaging about and help with being on the most suitable deal for you. Annual Statements would also help address this problem for many.

Fraudulent calls. Introducing a cap on how much people can be charged when their phones are stolen is a step uSwitch urges Ofcom to introduce. Currently, consumers can be charged up until the moment they inform their network. With credit cards there is a £50 fraudulent costs limit. We believe that something similar could be introduced in the mobile industry. Broadband:

Switching bundles - Ofcom need to ensure that this is a smooth and easy as possible, particularly because of the growing popularity of bundled products. More should be done around education too - including debunking myths and highlighting the savings that can be made by bundling.

Reducing the time taken to switch - the time it takes to switch broadband is putting people off. Steps have been taken in money (current accounts) to reduce this time to a week, and First Utility is campaigning for the time taken to switch energy suppliers to also be cut, and limited. We'd like to see the broadband industry follow suit and want Ofcom to lead on this, implementing time limits fir switching and fines for failing to comply.

Educating consumers - through contract end date reminders. Consumers who know when they're contract ends are more likely to switch - meaning they could move to a better deal, especially considering the prevalence of introductory pricing.

Improving service - specifically rural broadband. It is key that Ofcom continues to focus on delivering this to consumers - not just higher average speeds/ fibre in urban areas. We are concerned about EE's recent suggestions that an increase in spectrum fees would see the provider cut back on rural rollout of 4G - these could be a huge blow to consumers.