



By email: MobileQoE@ofcom.org.uk

Date 1st April 2013

Dear Ms. Ruth John,

RE: FSB response to Measuring mobile quality of experience

The Federation of Small Businesses (FSB) welcomes the opportunity to respond to the above named consultation.

The FSB is the UK's leading business organisation. It exists to protect and promote the interests of the self-employed and all those who run their own business. The FSB is non-party political, and with 200,000 members, it is also the largest organisation representing small and medium sized businesses in the UK.

Small businesses make up 99.3 per cent of all businesses in the UK, and make a huge contribution to the UK economy. They contribute 51 per cent of the GDP and employ 58 per cent of the private sector workforce.

In its consultation response the FSB recommend that Ofcom initiate a programme for continuous and independent performance monitoring of the quality of mobile services.

Instead of the current market driven self regulation approach we would like to see objective information published by Ofcom and based on actual user experience and actual measurements.

We trust that you will find our comments helpful and that they will be taken into consideration.

Yours sincerely,

Neil Hoose

Chairman of the Infrastructure Policy Unit

Federation of Small Businesses



Federation of Small Businesses
The UK's Leading Business Organisation



**FSB
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consultation
on
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For small businesses mobile communications are critical. In a recent survey¹ of over 3000 businesses 69 per cent of respondents said that the mobile phone is crucial or very important to their business. Only 3 per cent said the mobile phone is not at all important.

Over half of small businesses (54 per cent) have said that they have network problems and experience a lack of mobile signal very often or quite often. Only 4 percent said they never experience any problems with lack of signal.

Given these results and the importance of mobile networks to our member the FSB agrees that it would be very useful if Ofcom collected performance data for mobile operations. It is important that consumers have access to information about the general effectiveness of the current mobile network, about its operational performance, about coverage and quality of services. This information would help small businesses make informed choices about the mobile service they purchase.

As stated in the consultation document Ofcom has, for several years, collected information on fixed broadband speeds. This information has enabled consumers to improve their purchasing decisions, and appears to have driven improvements in service quality by operators.² The record and usefulness of collecting this data is therefore strong.

The current position is that the UK mobile telecoms operators are essentially self-regulating in terms of coverage and the performance level they deliver. The FSB believes that coverage is largely judged by operator supplied prediction maps, and there has been no real independent benchmarking for some time in the UK. This means the commercial driver for mobile network operators to work to improve network performance is limited. This in our view is leading to a reduction in effective competition.

However, performance monitoring on its own is not going to improve competition. One key area that needs improving alongside this is the ability to switch between service providers. The current system causes unnecessary delay when switching and it is far too complicated to move from one provider to another. The whole point of performance monitoring is that you as a consumer can switch to a better provider. So performance monitoring must go hand in hand with measures to make switching easier.

The FSB recommends that Ofcom initiates a programme for continuous and independent performance monitoring of the quality of mobile services. With the completion of the spectrum auction in February this year will start seeing 4G services becoming more available

¹ FSB Voice of Small Business Survey Panel, Infrastructure Survey April 2012.

² <http://stakeholders.ofcom.org.uk/binaries/consultations/mobile-voice-data-experience/summary/condoc.pdf>



over the next couple of years and benchmarking mobile broadband services is going to become more relevant. Instead of the current market driven, self regulation approach, we would like to see objective information published by Ofcom based on actual user experience and actual measurements.

Alongside this, measures for improving the ease of switching service provider are necessary for the performance benchmarking to be meaningful.

For further information

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