

Communications Consumer Panel and ACOD response to Ofcom's Call for Input: Measuring mobile quality of experience

Introduction

1. The Communications Consumer Panel and the Advisory Committee on Older and Disabled People welcome this opportunity to comment on Ofcom's Call for Input: Measuring mobile quality of experience.
2. The Communications Consumer Panel is an independent panel of eight experts who work to protect and promote people's interests in the communications sector. We were established by the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and small businesses.
3. 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 small businesses, which face many of the same problems as individual consumers. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise 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.
4. There is also cross-membership with Ofcom's Advisory Committee on Older and Disabled People (ACOD). This means that Members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.
5. We strongly support this initiative. We agree with the statement that, "The extent to which operators are incentivised to improve their consumers' QoE is in part related to the competitive advantage that they can gain from offering the higher quality. However, unless consumers are able to take the QoE offered by different operators into account when making purchasing decisions, there is less incentive for operators to invest in improving it." The provision of better information will help consumers make better choices, which in turn may drive up services levels.
6. People from all walks of life are increasingly reliant/dependent on mobile devices - and not just for calls/texts but for accessing information, transactions, reporting problems, booking tickets etc. This type of usage will increase rapidly and a lost connection when making, for example, a transaction is potentially extremely problematic.
7. For small businesses, poor signal quality, dropped calls or interrupted transactions can be a cause of lost business and consumer dissatisfaction. We note from the research that SME's used their mobile phones more frequently and were also more

likely than individual consumers to be dissatisfied with their ability to make and receive calls; and more likely to have experienced problems with reception, signal strength, dropped calls and sound quality.

8. As you may know, the Panel has expressed its concerns about inadequate mobile coverage on many occasions. In the Panel's view, the lack of voice and/or data coverage is no longer one of simple irritation for consumers and small businesses but is now becoming an issue of real detriment. There is an urgent need to drive rapid improvements in rural and semi-rural mobile voice and data coverage if these sections of society are not to be left behind by the rapid mobilisation of the way businesses interact with each other and their customers.
9. In our 2009 research *Mobile coverage: the consumer perspective*¹ and *Mobile Coverage: the Small Business perspective*² we found that mobile phone coverage is important to consumers, with respondents rating it as more important than cost when choosing a network provider. The Panel found that over half (56%) of consumers had experienced problems with reception, a third of them (33%) regularly. This was followed by our 2010 report *Can I cancel? Mobile coverage and contract cancellation*³ which examined the information consumers were given about operators' cancellation policies and called for coverage cancellation policies to be simplified.
10. These problems have not abated - as the Call for Input notes "The performance of these networks can vary between operators, by location and time of day and may not always meet the expectations of consumers." We note from the research published alongside the Call for Input that 81% of consumers report overall satisfaction with their mobile provider. Although the Consumer Experience report found higher levels of satisfaction at 89% this still means that around 6.6 million UK adult mobile customers do not say they are satisfied, with 4.3 million stating dissatisfaction.
11. There are other areas of work that Ofcom is undertaking - or that we have urged it to undertake - that are also relevant in this area. The Panel is looking forward to the publication of the assessment of communications provision across the UK - and in the devolved nations particularly. The Panel hopes that any recommendations that are made in the report will be explored with stakeholders during the course of 2013/14.
12. Secondly, and as noted in our response to Ofcom's draft Annual Plan, we are particularly pleased to see that one of Ofcom's priorities for the coming year will be to promote opportunities for people to participate. This is especially important as we move to a society where there will be a 'digital by default' delivery of many government services, and consumers who are not online are increasingly disadvantaged, disempowered and disenfranchised. Being excluded from an increasingly online world has now become a matter of significant consumer and citizen harm. The role of mobile broadband therein is particularly pertinent in relation to this Call for Input.

¹ http://www.communicationsconsumerpanel.org.uk/Mobile_coverage_consumer_perspective.pdf

²

http://www.communicationsconsumerpanel.org.uk/Mobile_coverage_small_business_perspective.pdf

³ http://www.communicationsconsumerpanel.org.uk/Can%20I%20cancel_main%20report_FINAL.pdf

13. Turning to our specific points, we focus in this response on what information we consider would be of value to consumers and less on what data is required to provide it and how to collect it. In terms of information of value to consumers, we would not wish to see this limited only to technical network and service information. Therefore inclusion of the following information areas is also critical:
- reliability and consistency: voice and data coverage and by number of operators; call failure rates; dropped call rates, data connection likelihood and speed; SMS delivery times;
 - price;
 - clarity of key contract Ts & Cs, particularly in respect of price changes and early termination penalties;
 - complaints data - volumes, speed of resolution;
 - billing accuracy; and
 - ease of contact.
14. In respect of coverage, we would suggest information should be about indoor; outdoor; and on the move voice and data coverage. Such data needs to be at a granular level and also available in respect of location and time of day. Road and rail coverage is important for travelling individuals, in addition to business users. The information also needs to cover areas where few or no people live, as people regularly travel across these areas - the numbers of consumers living in some areas is not an accurate reflection of the numbers of people who will want to know what network coverage and service is like in those areas when choosing which operator to select.
15. For some severely disabled and some older people detailed coverage information is particularly vital when travelling. These people are especially vulnerable in case of breakdown or other emergency when in isolated rural areas; the same applies to those consumers who live in those parts of the country. In the Highlands of Scotland there is a specific difficulty experienced by the emergency services when trying to communicate with each other, or in using mobile devices such as smartphones or tablets to take pictures to send to colleagues or access reference information when they're attending accidents etc. We imagine that this situation is likely to be similar to any other remote rural areas throughout the UK.
16. Any information published should be in easily accessible plain English - and in terms of what it means for the consumer. Therefore we would suggest avoiding using terms like 3G, 4G etc. The important information is about what the service does. We agree that the differing information needs of different consumers groups are likely to lead to the publication of information in a variety of formats - some of which may be by third parties. We agree that a combination of predicted and actual metrics would be the best approach. As far as possible, the information provided should be future-proofed.
17. We would suggest that annual updates to consumer information are too infrequent. Quarterly reports, including coverage, would be more appropriate. If operators were willing to share information about the progress of local build plans for extending the networks, this would be helpful to consumers who were considering their longer term plans. The Panel is also interested by the potential offered by apps to collect data about the mobile coverage experienced by users and its collation for wider-reporting purposes.

18. We would encourage the provision of information at a holistic level about the mobile consumer experience. Information about billing tools and alerts available from an operator; how to accurately judge your likely data usage requirements and how your needs might change in the next few years; the influence on performance of particular handsets; and accessibility features all contribute towards allowing an individual to make an informed choice of service.
19. We would strongly encourage the provision of consumer satisfaction statistics at a detailed level. The consumer research report published alongside the call for inputs provides analysis by rural and urban population and by nation, but it does not report on the mobile experience for urban and rural populations within nation. For example, in Scotland 90% of Scotland's population live in a quite densely-populated swathe across the Central Belt and up the East Coast. In the Panel's experience, the remaining 10% do not enjoy the mobile voice and data experience of the majority. For this reason, it is essential that any quality of experience reporting distinguishes between the urban and rural experience across the UK and within devolved nations.
20. Additionally, satisfaction is based on experience - people in rural areas are likely to have experienced having only one or two providers, or being in areas where there is no coverage at all. So the level of mobile experience which equates to satisfaction in that context may well be lower than that for urban dwellers. For this reason, we welcome the provision of objective as well as more subjective measures.

Summary

21. We strongly support this initiative. Both consumers and small businesses are increasingly reliant/dependent on mobile devices. The provision of better information will help consumers make better choices, which in turn may drive up services levels. The lack of voice and/or data coverage is no longer one of simple irritation for consumers and small businesses but is now becoming an issue of real detriment. Around 6.6 million UK adult mobile customers do not say they are satisfied with the overall performance of their mobile provider, with 4.3 million stating dissatisfaction.
22. In terms of information of value to consumers, we would not wish to see this limited only to technical network and service information. In respect of coverage, we would suggest information should be about indoor; outdoor; and on the move voice and data coverage. Such data needs to be at a granular level and also available in respect of location and time of day. Road and rail coverage is important for travelling individuals and business users - especially people who are severely disabled or older. The information also needs to cover areas where few or no people live, as people regularly travel across these areas.
23. Any information published should be in easily accessible plain English, in a variety of formats - and in terms of what it means for the consumer. We would suggest that quarterly reports, including coverage, are most appropriate. We would also encourage the provision of information at a holistic level about the mobile consumer experience and consumer satisfaction statistics at a detailed level, which distinguishes between the urban and rural experience across the UK and within devolved nations.