

Consultation Response

Consumer Switching

Proposals to reform switching of mobile communication services - Which? consultation response

Which? is the largest consumer organisation in the UK with more than 1.2 million members and supporters. We operate as an independent, a-political, social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. Which?'s mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

Which? welcomes the opportunity to comment on Ofcom's consultation to reform the switching of mobile communication services. Which? has been calling for Gaining Provider Led (GPL) switching for some time and wants to see switching providers made easier. In this response Which? does not intend to address each individual question posed by Ofcom. Our responses to the Ofcom call for evidence on 'Consumer Switching' in July 2014¹ and the Ofcom consultation on 'Consumer Switching: Consumer experience of switching mobile communication services' in October 2015² still stand.

In particular:

- Gaining Provider Led (GPL) switching in mobile should be introduced swiftly. Automatic PAC is not sufficient to address the consumer detriment arising from Losing Provider Led switching.
- Ofcom should move to make sure that switching in triple play services is implemented in a way that does not harm consumers.

Which? is concerned that the current consultation simply reiterates the need for GPL switching in mobile more than 18 months after the original call for evidence and almost a year after a previous Ofcom consultation on mobile switching.

Which? notes that since this consultation was launched, the Government has announced plans to make switching easier across a range of sectors including telecoms through a Better Markets Bill and the proposed Digital Economy Bill includes a measure on GPL switching. Which? welcomes these announcements and hopes that these measures are brought into force as soon as possible.

Switching in mobile

Telecoms services are important services for consumers and increasingly considered essential by many. Ofcom data highlights that 90 per cent of adults in the UK now use a mobile phone.

As consumers continue to increase their usage of these services it is vital that these markets work well for them. An important feature is the ability to switch providers quickly and easily to achieve the best available deal. Switching plays an important role in promoting competition amongst providers and helps drive innovation.

¹ <http://stakeholders.ofcom.org.uk/binaries/consultations/consumer-switching-cfi/responses/Which.pdf>

² <http://stakeholders.ofcom.org.uk/binaries/consultations/mobile-switching/responses/Which.pdf>

Which? is a consumer champion

We work to make things better for consumers. Our advice helps them make informed decisions. Our campaigns make people's lives fairer, simpler and safer. Our services and products put consumers' needs first to bring them better value.



Ofcom research highlights there are still low levels of switching across the communications sector, and in particular amongst mobile phone customers, with only 10 per cent of consumers switching mobile provider in the past 12 months.

Which? notes that Ofcom's analysis supports our own view that GPL is essential to address consumer harm identified by Ofcom in section five of the consultation document. On its own, automatic PAC is not sufficient. Which? welcomes the measures to make sure that other barriers to switching are removed, such as the risk of double billing and the risk of loss of service, and should be implemented without delay.

It is therefore important that Ofcom implements the measure that will have the greatest benefit to consumers and will address barriers to switching. Which? firmly believes that GPL switching will have the greatest impact on consumers' experience.

Other comments

Finally, Which? believe that Ofcom should move quickly to ensure that switching in triple play services works well for consumers. Ofcom should not wait and should ensure that unfair terms don't become embedded in the system.

For more information,
contact James Taylor on 020 7770 7254 or james.taylor@which.co.uk
Which?, 2 Marylebone Road, London NW1 4DF
May 2016