
Telecoms and pay TV complaints

Detailed methodology

1. Introduction

- 1.1 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.¹ All complaints² 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.
- 1.2 In this Annex, we outline key elements of the approach we have taken for publication of our Q4 2019 complaints data.

2. Limitations

- 2.1 When considering the information in this report, readers should note 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 incorporate complaints consumers may have made directly to their providers or to other agencies (e.g. alternative dispute resolution schemes). As such it only provides a partial picture of complaints relating to any provider.
 - The complaints data reflects the views of consumers as reported to Ofcom and the way we record them. 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 (lack of) 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) or other high-profile issues arise (such as network failures or where providers make changes to their services).
 - Bigger performance fluctuations are more likely for smaller operators than larger operators because of the smaller numbers of subscribers against which complaints are measured for these operators. This should be taken into account when observing shorter term movements in the data.

¹ Refer to: <https://www.ofcom.org.uk/complain-to-ofcom>.

² 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.

3. Scope of the data published

- 3.1 We collect complaints data across a wide range of services: broadcasting, telecoms, other spectrum uses, and post.³
- 3.2 The focus of this data release is complaints made by residential⁴ consumers in relation to landline, fixed broadband, pay-monthly mobile and pay TV services. As consumers complain to Ofcom about a wide range of issues⁵ we have considered carefully the way we record complaints and what level of data would be useful and robust enough for publication.
- 3.3 In any single call to Ofcom, or other contact with us, a consumer may complain about one or more separate matters. If they complain about two separate matters (e.g. billing and complaint handling) relating to one service (e.g. fixed broadband), we record that as two complaints. Where they complain about more than two matters, we generally record only the two most serious ones per service unless it is not possible to determine this through discussion with the consumer (e.g. the contact is made by letter) or the consumer specifically requests that all their complaints are logged. Complainants raising more than two matters relating to the same service account for around 1% or less of total complainants in each sector. In general, we record up to two complaints per service per contact. An average of 1.5 complaints were recorded per consumer contact with Ofcom in 2018.
- 3.4 The four services covered in this data release are:
- Fixed broadband, which includes copper-based ADSL⁶ services, cable services and fibre services;
 - Pay-monthly mobile services;⁷
 - Landline services, which includes complaints against companies that offer both line rental and calls as well as those that supply calls only services; and
 - Pay TV, which includes complaints relating to access to the service but not complaints about the content delivered over the pay TV service. This category includes services provided over cable, satellite, digital terrestrial television or over a dedicated broadband connection.

³ We publish complaints about the content of programmes broadcast on television by provider in our Broadcast and On-Demand Bulletin. Spectrum complaints cannot be reported in more detail as the majority of complaints are about individual instances of interference.

⁴ Ofcom records business and residential telecoms complaints separately, based on how the individual identifies their contract type when reporting the complaint.

⁵ We currently record over 159 different categories of telecoms complaints.

⁶ Asymmetric Digital Subscriber Line Broadband (i.e. broadband over a copper line).

⁷ Mobile pay-monthly services will include complaints about use of data through a mobile handset but do not include dongles or data cards.

4. Complaints about bundled services

- 4.1 Many consumers choose to purchase a bundle of services from one provider (for example, landline 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 recorded by us.
- 4.2 The approach we take when recording complaints received from consumers 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 consumer 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 is about an issue that 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.
- 4.3 This approach enables us to have a record of all complaints received by provider and by service. As we publish total complaints by provider for each service, but not across the services in aggregate, the complaints are not double-counted.

5. Complaints about transfers to unknown providers

- 5.1 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.⁸ In these circumstances Ofcom refers the case to Openreach to find out recent activity on the line, including applications to transfer and completed 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.

⁸ Their existing provider may not have visibility of the new provider either and may only be aware that a request has been made to take over the service.

6. Focus on the largest providers

- 6.1 Ofcom records complaints received by it against any provider in the UK. The size of individual providers varies greatly, as does the number of complaints received. As a result, to ensure that this report covers as many providers as reasonably practicable, we adopt a criterion to help us decide which providers are included in the report.
- 6.2 Following a review,⁹ from Q2 2014 onwards this report now generally includes complaints data for those providers which, for the service being reported, have a stable market share of 1.5% or more in relevant market.¹⁰ A provider will generally¹¹ be removed from the report if its market share has dropped below 1.5% for four consecutive quarters.
- 6.3 For providers included in the reporting for periods before Q2 2014, we have not retrospectively adjusted the previous generally applied publication criteria for inclusion (i.e. having a 4% market share and regular generation of at least 30 complaints per month). Therefore, the previous criteria still apply to those reports.
- 6.4 The scope of this data release encompasses the providers set out in Table 1 below. Together, these providers account for at least 90% of each market covered.¹² For the purposes of this report, we collate complaints by individual subsidiaries and brands (we consider different brands owned by a single provider separately).

Table 1: Providers included in this data release

Fixed broadband	BT
	EE
	Plusnet
	Post Office
	Sky
	TalkTalk Group
	Virgin Media
	Vodafone
Pay-monthly mobile	BT
	EE ¹³
	iD Mobile
	O2
	Sky Mobile

⁹ For publications up to, and including, Q1 2014, providers were generally included in the report if they had a relevant market share of 4% and regularly generated more than 30 complaints per month. See our Q2 2014 report for further detail.

¹⁰ In the absence of exceptional circumstances, in which, should they apply, we may take a different approach. From time to time, new providers may join the group of those whose market share is above 1.5%. New providers will generally be added to the report after a period in which their market share has consistently been above that threshold, such that it should be considered a stable market share above that mark.

¹¹ In the absence of exceptional circumstances.

¹² At least 95% of market for landline services, 97% for fixed broadband, 97% for pay-monthly mobile telephony and 99% for pay TV.

¹³ This includes Orange, T-Mobile and 4GEE.

	Tesco Mobile	
	Three	
	Virgin Mobile	
	Vodafone	
Landline	BT	
	EE	
	Plusnet	
	Post Office HomePhone	
	Sky	
	TalkTalk Group	
	Virgin Media	
	Vodafone	
	Pay TV	BT
		Sky
TalkTalk Group		
Virgin Media		

Aggregating data

- 6.5 For pay-monthly mobile we present data for Orange, T-Mobile and 4GEE in an aggregated form. The charts throughout the report refer to this data as 'EE'.

7. Complaints as a proportion of subscribers

- 7.1 Given the variation in size of providers, we publish complaints as a proportion of providers' relevant subscriber base to put complaints numbers into context and to help ensure the data is more meaningful for consumers.
- 7.2 To achieve this, we use the number of residential subscribers¹⁴ provided to Ofcom by the operators in question. We do not collect these returns for pay TV providers. To calculate pay TV complaints per one-hundred thousand subscribers, we use customer data from the providers own published investor reports or, if they are not in the public domain, we request them from providers directly.
- 7.3 We understand from providers that quarterly subscription data is generally more robust than monthly data¹⁵ and therefore we use quarterly data to calculate the complaints data.
- 7.4 There are some differences in the methodologies providers use to compile subscriber figures that they supply to Ofcom. We conduct regular checks to ensure that providers' subscriber figures used in the report are comparable and we will continue to monitor this.

¹⁴ Note that it is possible for an individual to have more than one subscription.

¹⁵ Particularly where the quarterly data is reported externally.

- 7.5 In instances where there is little material difference between operators' complaint levels, for example an absolute difference between providers complaints per 100,000 subscriber figures of less than 1, we treat their performances as equivalent.

8. Approach to provider subscriber figure adjustments

- 8.1 Occasionally, providers re-submit their subscriber figures after publication of one of our complaints reports: for example, where it finds the data it gave us was incorrect. If a provider subsequently resubmits its subscriber figures, Ofcom will not usually adjust historic data unless the discrepancy has a significant impact on the results.

9. The industry average line

- 9.1 As an additional data point against which to measure the performance of each provider, we include an industry average line of complaints per 100,000 customers. This average shows the total number of complaints per sector divided by the total number of subscribers to all providers included in the published data for each service, divided by 100,000. It does not incorporate complaints about or subscribers to smaller providers who generally have a market share lower than 1.5%.