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# Telecoms and pay-TV complaints

Background and methodology

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# 1. Background

Ofcom's principal duty is to further the interests of citizens in relation to communications matters and to further the interests of consumers in relevant markets, where appropriate by promoting competition. In doing so we must have regard to the interests of consumers with respect to the price of communications services, value for money and quality of service.

Ofcom research suggests that people are broadly happy with their communications services. The proportion of people who were satisfied with their communications services in 2021 was 77% for landline services, 83% for broadband services and 91% for all mobile services – see the latest Comparing customer service report.<sup>1</sup> Where concerns arise, consumers typically raise their complaint with their provider in the first instance. If the provider is not able to resolve the complaint within eight weeks, or if they reach deadlock before then, the consumer can make an application to an independent Alternative Dispute Resolution (ADR) scheme. The ADR scheme can examine the complaint and make a judgement on the issue.<sup>2</sup>

In addition, some consumers choose to contact Ofcom. Ofcom received over 76,135 calls, web forms, emails and letters directly from consumers in 2021/22.<sup>3</sup> Many of these contacts result in complaints and some contain more than one complaint. These complaints are likely to be made where a consumer has been unable to resolve an issue with their provider to their satisfaction. While Ofcom does not resolve individual complaints, it offers consumers advice on how they might best seek to resolve the issues raised.

We record complaints by service (e.g. fixed broadband or pay TV) and by provider. We use the complaints data to inform policy, enforcement and monitoring work, helping to ensure fairness for consumers.<sup>4</sup>

## Why publish provider-specific complaints?

Alongside the price of communications services, there are a number of measures that may be useful to help consumers assess the quality and value for money available from providers. Since April 2011 we have published quarterly residential Ofcom complaints data by provider. We have also published research on 'customer service satisfaction', on a provider-specific basis, since 2009. The latest research was published as part of Ofcom's Comparing customer service report.<sup>5</sup> That report includes additional consumer research and other metrics, broken down by service and provider, showing general levels of consumer satisfaction, satisfaction with reliability and satisfaction with complaints handling, among other metrics.

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<sup>1</sup> Ofcom, [Comparing customer service: mobile, home broadband and landline](#), 18 May 2022.

<sup>2</sup> Ofcom requires all providers to be a member of an approved ADR scheme: [Communication Ombudsman](#) and the [Communications and Internet Services Adjudication Scheme](#).

<sup>3</sup> [Ofcom Annual Report 2021/22](#), p. 54.

<sup>4</sup> Information on any investigation we launch as a result of complaints to Ofcom can be found in the [Enforcement Bulletin](#).

<sup>5</sup> Ofcom, [Comparing customer service: mobile, home broadband and landline](#), 18 May 2022.

We recognise that there is no single source of information that can give consumers a full picture of the relative performance of different providers. In addition, different service features will matter more for some consumers than for others. For many consumers, comparative price and network performance information is of primary importance. Ofcom has improved the information available in these areas – examples include the publication of broadband speeds research, mobile coverage maps and our scheme for accrediting price comparison calculators.

The publication of performance data is consistent with our statutory duty relating to transparency and our obligations as a public authority. Consumer information also plays a critical role in ensuring that competitive communications markets work for consumers. The absence of information can lead to poor purchasing decisions and inhibit switching. If such information is not readily available or is unclear, there may be a case for Ofcom to intervene in the interests of consumers. Under section 26 of the Communications Act 2003, we have a duty to arrange for the publication of such information and advice as appears to us to be appropriate to make available to consumers.<sup>6</sup>

We believe that our complaints data, along with other information (for example, information on price, speeds, coverage, and contract terms) can be useful for consumers seeking to compare providers.<sup>7</sup> We also observe that the data is of interest to intermediaries such as consumer groups, price comparison services that advise consumers, and journalists. The publication of provider-specific complaints data may act as an incentive for providers to improve their performance.<sup>8</sup>

The ADR schemes that Ofcom approves, Communications and Internet Service Adjudication Scheme (CISAS) and Communication Ombudsman (CO): Communications (OS), also publish quarterly complaints information regarding their member communications providers that have a market share over 1.5%.<sup>9</sup> Similar information is available in a number of other sectors, including for example financial services.<sup>10</sup>

Taking the above into consideration, we consider that the objectives of publishing this report are to:

- ensure transparency of data;
- further the interests of citizens and consumers by providing them with information that will help them facilitate and take advantage of a competitive market; and
- incentivise improved provider performance.

Further information about the methodology for compiling the complaints data, including how we account for the variation in size of provider, limitations of the data and how we record complaints about bundled services, can be found in the Methodology section.

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<sup>6</sup> Having regard to the need to exclude confidential information from publication. For the reasons set out here, Ofcom considers that, having had that regard, publication of the information in this report is appropriate.

<sup>7</sup> In the [Statement for our Review of Complaints Procedures](#), we stated that publishing complaints data would likely benefit consumers in respect of price, quality and value for money. We also noted that there are a number of ways for such information to be made public.

<sup>8</sup> See the responses of key consumer groups to Ofcom's [consultation on complaints handling procedures](#).

<sup>9</sup> See [CISAS](#) and [Communication Ombudsman](#) quarterly case data.

<sup>10</sup> See, for example, [FCA complaints data](#).

## 2. Methodology

Consumers, both residential and business, can contact Ofcom with complaints.<sup>11</sup> or enquiries over the phone, by letter or through one of the dedicated complaint submission forms on [our website](#). All complaints are logged by Ofcom's Consumer Contact Team, 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.

In this section, we outline key elements of the approach we take to the publication of our complaints data.

### Limitations

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. ADR 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.

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<sup>11</sup> 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.

## Scope of the data published

We collect complaints data across a wide range of services: broadcasting, telecoms, other spectrum uses and post.<sup>12</sup>

The focus of this publication is complaints made by residential consumers in relation to landline, fixed broadband, pay-monthly mobile telephony and pay-TV services.<sup>13</sup> As consumers complain to Ofcom about a wide range of issues,<sup>14</sup> we have considered carefully the way we record complaints and what level of data would be useful and robust enough for publication.

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 for each service.

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 2021.

The four services covered in this publication are:

- Fixed broadband, which includes copper-based ADSL.<sup>15</sup> services, cable services and fibre services;
- Pay-monthly mobile services;<sup>16</sup>
- 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.

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<sup>12</sup> 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.

<sup>13</sup> Ofcom records business and residential telecoms complaints separately, based on how the individual identifies their contract type when reporting the complaint.

<sup>14</sup> We currently record over 186 different categories of telecoms complaints. Complaints about the broadband universal service obligation were previously included in this report for two years (from Q1 2020 to Q4 2021). We decided to stop reporting on these complaints because of persistent low volumes. We will continue to monitor the volume of these complaints.

<sup>15</sup> Asymmetric Digital Subscriber Line (i.e. broadband over a copper line to the street cabinet and the premises).

<sup>16</sup> Mobile pay-monthly services will include complaints about use of data through a mobile handset but do not include dongles or data cards.

## Complaints about bundled services

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.

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.

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.

## Complaints about transfers to unknown providers

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.<sup>17</sup> 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.

## Focus on the largest providers

Ofcom records complaints that it receives about 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.

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<sup>17</sup> 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.

Following a review,<sup>18</sup> 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.<sup>19</sup> A provider will generally<sup>20</sup> be removed from the report if its market share has dropped below 1.5% for four consecutive quarters.

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.

The current scope of the report encompasses the providers set out below. Together, these providers account for at least 91% of each market covered.<sup>21</sup> For the purposes of this report, we collate complaints by individual subsidiaries and brands (we consider different brands owned by a single provider separately).

## **Providers included in this report**

### **Fixed broadband**

- BT
- EE
- NOW Broadband
- Plusnet
- Shell Energy
- Sky
- TalkTalk Group
- Virgin Media
- Vodafone

### **Pay-monthly mobile**

- BT Mobile
- EE<sup>22</sup>
- iD Mobile
- O2
- Sky Mobile
- Tesco Mobile

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<sup>18</sup> 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 more detail.

<sup>19</sup> 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.

<sup>20</sup> In the absence of exceptional circumstances.

<sup>21</sup> At least 91% of market for landline services, 95% for fixed broadband, 98% for pay-monthly mobile telephony and 99% for pay TV.

<sup>22</sup> This includes Orange, T-Mobile and 4GEE.

- Three
- Virgin Mobile
- Vodafone

### Landline

- BT
- EE
- NOW Broadband
- Plusnet
- Shell Energy
- Sky
- TalkTalk Group
- Virgin Media
- Vodafone

### Pay TV

- BT
- Sky
- TalkTalk Group
- Virgin Media

## Aggregating data

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'.

## Complaints as a proportion of subscribers

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.

To achieve this, we use the number of residential subscriptions.<sup>23</sup> provided to Ofcom by the operators in question. We do not collect these returns for pay-TV providers. To calculate pay-TV complaints per 100,000 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.

We understand from providers that quarterly subscription data is generally more robust than monthly data.<sup>24</sup> and therefore we use quarterly data to calculate the complaints data.

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<sup>23</sup> Note that it is possible for an individual to have more than one subscription.

<sup>24</sup> Particularly where the quarterly data is reported externally.

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.

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 one, we treat their performances as equivalent.

Where a provider's figure, for example those used in the complaints tables or graphs, falls below 0.5, it will be rounded to one decimal place for clarity.

## **Approach to provider subscriber figure adjustments**

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.

## **The industry average line**

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 service 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%.