

Dear Mr Unger,

As a member of the Consumer Forum for Communications (CFC) and the UK's only charity dealing with vulnerable people's access to TV and radio, WaveLength would like to add to Roger Darlington's CFC response to the recently announced plans for an SRDC review.

Due to the late announcement of this review, coming very close to pre-election purdah, these thoughts are initial responses.

1. Along with the CFC, we believe the stated good outcomes of the review are secondary rather than primary outcomes. Primary outcomes should include take-up rather than simply coverage, value rather than simple price, satisfaction rather than externally-assessed quality of service and critically, exercise of choice rather than simple availability of choice. Even if consumers have a theoretical choice of providers, actual switching levels may not be at a level which exercises real commercial pressure on competitors. This is particularly important for the UK's vulnerable people, as well as consumers in general, because issues which may hinder exercise of choice – such as ease of joining, swapping services, complaining and accessibility of communications - will not be flagged up if only apparent availability of choice is considered.
2. While we understand Ofcom's wish to restrict the SRDC to carriage rather than content issues, this era of bundled services means that carriage and content necessarily interact in competitive consumer offerings. Digital technology allows for the delivery of many services to a single access point or device bought from a single provider. SRDC needs to understand all digital services people are purchasing, or primary relationships will be missed. For example, HD was brought to TV broadcasting with the understanding that broadcasters would produce quality public programming. However many TV licence payers cannot yet receive HD and are funding those who can. The review should look at access to content for all licence-players, looking not just at parity between service companies, but in service delivery as well.
3. There seems to be no mention of a review of the impact on UK consumers of decisions such as the separation of BT and Openreach. It's important to know if faults are being corrected, how easily consumers can communicate with each company, and how well they work together to resolve problems.
4. The CFC has called for plain English summaries of Ofcom documents relating to the review to be distributed to consumer and citizen groups including the CFC and Communications Consumer Panel. We would like to add that these summaries should be provided in accessible formats.

Thank you for reading these points. I hope that they will play into your shaping of the SRDC review going forwards, and look forward to working with you to ensure that the needs of vulnerable consumers are considered and met.

Yours sincerely,

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