

# SERL response to “Improving broadband information for customers. Proposal for new guidance to improve customer information”

## Introduction

SERL has read with interest the Ofcom consultation “Improving broadband information for customers. Proposal for new guidance to improve customer information” (the “Consultation”). We fully agree with Ofcom that clarity in terminology is important and that customers are not misled when they buy telecoms services. In this response we outline our views on the proposals in the Consultation and also specific details

## SERL background

SERL is a provider of Phone and Broadband services to residential customers in the UK under the Shell Energy Broadband brand. At present it has approximately 500K customers, many of whom are vulnerable due to the older demographic of the customer base following the acquisition of the Post Office customer base in March 2021. Furthermore, the Shell Energy Broadband base over-indexes on customers who take a phone only service so are more reliant on the phone service for dealing with local and national Government.

## General Comments

SERL considers that it is important that customers understand the products they are buying and to this end a clear and meaningful description is important. For many customers buying broadband a key parameter is the speed of the service rather than the technology. This is the parameter that determines the performance they will actually receive and the price they will pay. Customers will generally not understand the technology type used to deliver the service and therefore are not likely to care.

Clearly the choice of delivery technology will influence some other related services such as existing analogue voice which is not delivered over FTTP and requires additional equipment. This choice will also potentially impact care alarms and a few other services. However, we do not think that is a particularly relevant issue here in the same way as the switch from FTTC to FTTP which is separately being managed as part of the overall process of migration from copper based voice to digital voice. Additionally the GCs require that providers make clear if a service won't work in the event of a power customer or other limitations. Telling a customer that the new service will be delivered over FTTP may not in itself provide much benefit to a prospective customer so may be of limited use.

We agree though that there should be some clarity in terminology to prevent customers from being mis-sold FTTC when they were expecting FTTP and on this basis we don't object to the proposal, if Ofcom considers that it offers some benefits.

## Response to specific questions

*A7. Consultation questions Consultation questions:*

*Question 1: Do you agree with our proposals to issue guidance under GC C2.3, GC C1.3 and GC C1.5 to clarify:*

*(1) that the description of broadband services should be consistent and include a one- or two-word description of the underlying technology; and*

*(2) that the use of the terms 'fibre' and 'full-fibre' in the information that is provided to customers should only be used to describe fibre-to-the-premises (FTTP) services.*

We agree that consistent terminology should be used to describe broadband services to customers. It should be a short, clear and meaningful description which should be easily understood by customers.

We agree that Full Fibre should only be used to describe FTTP services. However, we do not see significant issues from customers around the use of fibre to describe FTTC services. The biggest concern for our customers is the speed and reliability of their service and for the vast majority of our

FTTC customers works well. Through the various discussions around industry, we have not seen any suggestion of an alternative that reduces confusion.

*Question 2: Do you agree with our proposal for providers to give an explanation of the one- or two-word terms used to describe the service, in a way that can be easily accessed by customers? Please provide evidence in support of your views.*

We agree with the proposal for providers to give a one- or two- word explanation to customers. To ensure that customers are able to make meaningful comparisons of services we think it is important that there is uniformity across providers.