

This is an individual response to your call for your Call for inputs: Helping consumers to engage in communications markets

You state that: "Ofcom is seeking views from interested parties about how we can further empower consumers and help them to better engage in communications markets. We want to understand why some consumers are not shopping around for better deals and what we, or industry, can do to address this."

I am a consumer, and therefore an interested party, and I believe that you should view this matter from the consumer perspective, in broader terms than simply communications.

The government as a whole encourages consumers to be "engaged" in actively surveying markets and switching providers in multiple sectors:

Electricity

Gas

Bank

Car insurance

House insurance

Broadband

Fixed line

Mobile

Pay TV

Savings accounts

Pension provider

Travel insurance

Let us assume that the initial process of sitting at a computer, finding a comparison site (which, by the way, often don't include the best deals, and certainly don't include retention deals as they are paid only if someone switches), entering several pages of personal details, consumption patterns and so on, deciding whether to switch and to whom, takes perhaps two hours. This may be an underestimate for less computer literate consumers.

Then, to actually switch you need to fill in a new contract with pages of details, provide several proofs of identity and consumption, details of current supplier and so on. Then you have to contact the existing supplier, spend time with their retention team, fill in a form to leave and a survey as to why and so on.

Then something will go wrong, and you have to make calls and send emails to fix that.

Let's say the whole process takes five hours. For the dozen services we are urged to "engage" with and switch, this would take up say 60 hours of leisure time a year. I can't find UK data, but in the US the average working adult has around 2.5 leisure hours a day. Excluding holidays, there are say 340 days in the year to do this, meaning that total leisure time of 840 hours a year could be reduced by 7% by "engagement and switching" activities.

Frankly, who really wants to do this?

The answer is not to try to increase the time consumers spend on this activity, but to render it not necessary. What consumers really want from essentially commodity products like

broadband, mobiles, current accounts and electricity are services that are reliable and fairly priced, and they don't want to have to constantly check up that they are on some substandard legacy tariff.

So I would urge OFCOM to implement a simple rule - all promotional and new tariffs must be actively offered to existing customers, or better still they should automatically be transferred to such a tariff. This would reduce the time wasted by consumers on switching, improve their peace of mind and ensure better customer satisfaction.

The industry would probably overall save money because they would not be wasting promotional discounts on a small group of active deal-hunters, nor spending commissions with switching sites and middle-men, nor having to fund retention desks. They would compete by offering cheaper, innovative or improved services to all customers.

Sadly, I suspect that this submission will not carry much weight in your survey, which will be dominated by an industry that is addicted to switching and marketing, an ecosystem of switching sites and advertisers that make excellent money off the process, ultimately paid by consumers, and a government and regulatory system that is wedded to the mantra of market forces and consumer choice and deaf to any voices that actually articulate what consumers really want.

To misquote a US senator, "No-one on their death bed ever said they wished they had spent more time on consumer comparison sites".

If you at OFCOM think that consumers cannot get a decent deal on their services without spending more of their valuable time in an activity that no-one wants to do, you should regulate the industry more actively to ensure they offer fair deals to all.

Yours,

[Frank Knowles](#)

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