

# Consultation response form

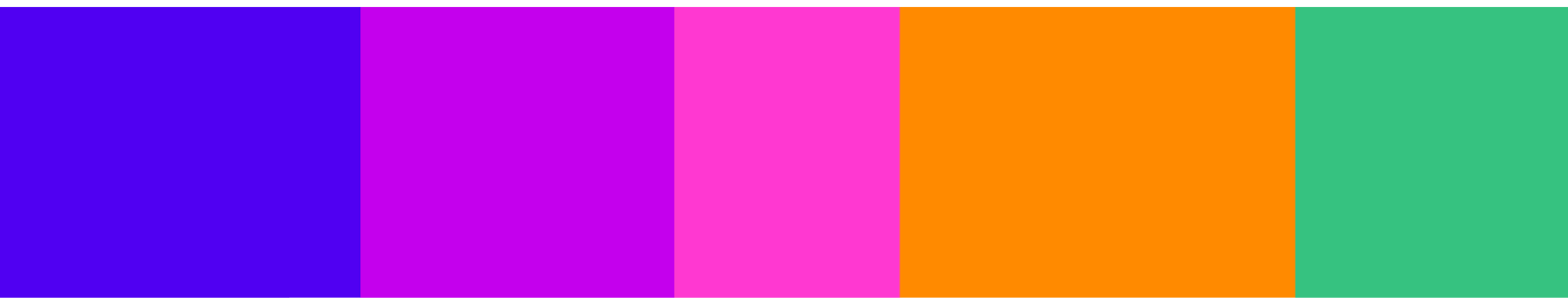
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<b>Consultation title</b>	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
<b>Full name</b>	Mitali Sud
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Internet Matters
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## Confidentiality

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<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes / No



## Your response

Question	Your response
<p><b>Question 1:</b> Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.</p>	<p>Confidential? – N</p> <p>The draft statement clearly identifies the main categories of services the recommendations are aimed at, and Internet Matters welcomes the breadth of organisations captured. Each category has an important role to play in supporting children’s media literacy, and we welcome Ofcom’s recognition of this. While children are increasingly encountering information on social media platforms, with 68% of children aged 11-17 reporting they get their news from social media, our research also shows that news outlets and broadcasters which are regulated and have editorial oversight continue to play a central role in how young people verify information. For example, 58% of 15-17 year olds report checking social media content against established news outlets to build their understanding and assess accuracy (<i>Informed or Overwhelmed?</i>, 2025, <a href="#">link</a>). It is therefore positive to see Ofcom’s statement targeted towards a wide range of organisations, including established news and broadcast services, social media platforms and generative AI services. We make three recommendations below to strengthen Ofcom’s proposal.</p> <p>Firstly, while we welcome Ofcom’s inclusion of generative AI services, <b>Ofcom can go further than merely stating that these services are “well-placed to embed media literacy practices early”</b>. <b>Ofcom should explicitly state that they <i>should</i>, given the pace at which they are reshaping children’s digital lives</b>. Our research highlights this rapid change: 64% of children aged 9-17 are now using AI chatbots, with use having grown significantly since January 2024 (<i>Me, Myself and AI</i>, 2025, <a href="#">link</a>).</p> <p><b>Secondly, Ofcom should explicitly recommend that generative AI services used in children’s education embed media literacy principles</b>, as they are increasingly being used in schools and by children for learning and homework. Only 29% of parents hold an optimistic view about the use of generative AI in education (<i>Artificially Intelligent?</i>, Internet Matters, 2024, <a href="#">link</a>). Yet, among UK children who use AI chatbots, 47% of 15-17 year olds report</p>

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	<p>using them for support with schoolwork (<i>Me, Myself and AI</i>, Internet Matters, 2025, <a href="#">link</a>).</p> <p>Children’s trust in these tools is also high: 40% of children who have used AI chatbots have no concerns about following advice from them, and a further 36% are uncertain if they should be concerned. This is even higher for vulnerable<sup>1</sup> children, with 50% reporting no concerns about following their advice (<i>Me, Myself and AI</i>, 2025, <a href="#">link</a>). As with other forms of media literacy education, provision in schools on AI is inconsistent: only 57% of children report having spoken with teachers about AI, and just 18% recall having done so more than once (<i>Me, Myself and AI</i>, Internet Matters, 2025, <a href="#">link</a>).</p> <p>Given these high levels of use and trust among children, coupled with parental concerns and the significant influence generative AI may have on how children learn, think and access information, <b>we recommend that Ofcom explicitly include education-focused AI services, and ed-tech services more broadly, in its final statement and encourage them to adopt the media literacy principles.</b> Embedding media literacy practices into ed tech tools will help ensure that children’s engagement with these technologies actively develops their critical thinking and information evaluation skills, rather than undermining them.</p> <p>Lastly, several organisations told us they found it difficult to determine which recommendations apply to them. We suggest that Ofcom present this information more clearly to support clarity and adoption. Paragraph 4.4, where Ofcom outlines this information, may not be sufficiently visible or accessible. To address this, <b>Ofcom should consider producing an illustrative grid or matrix mapping service categories to the recommendations.</b></p>

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<sup>1</sup> We refer to children who have an Education, Health and Care Plan (EHCP), who receive special educational needs (SEN) support, or who have a physical/mental health condition which requires professional help as ‘vulnerable’.

Question	Your response
<p><b>Question 2:</b> Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Internet Matters supports Ofcom’s intention for the proposed recommendation to apply proportionately to services based on size. <b>However, while smaller or emerging services may not be able to implement every recommendation immediately, they should still be expected to adopt the core principles of clarity, transparency and safety-by-design that underpin the recommendations.</b></p> <p>It is also important to recognise that smaller services can grow rapidly; an approach that does not set clear minimum expectations risks embedding a culture in which media literacy is retrofitted later rather than integrated from the outset. Ensuring a baseline of good practice across all services, regardless of current scale, will help future-proof the ecosystem.</p> <p>To support adoption by smaller services, <b>Ofcom could develop a tiered model or illustrative framework showing what proportionate implementation looks like at different levels for each recommendation. Ofcom could also indicate which on-platform media literacy interventions have the greatest impact and publish a set of recommended minimum standards.</b> This would give smaller services a clearer starting point and help ensure consistency and quality across the sector. <b>Additionally, as smaller organisations often lack in-house expertise to design or evaluate media literacy interventions, Ofcom could assist them by publishing a list of preferred expert providers.</b> This would help smaller services identify trusted third parties who can support development, testing and evaluation of media literacy measures, reducing barriers to implementation.</p> <p>Lastly, we recommend expanding the scope of Recommendation 7 as explained below.</p>
<p><b>Question 3:</b> Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Internet Matters welcomes Ofcom’s overall framework and agrees that the four aims capture the right priorities for promoting media literacy across the digital landscape. We support the ambition to make the recommendations relevant across a broad range of services and to encourage greater consistency in how media literacy is built into design and delivery.</p>

Question	Your response
	<p>Our research highlights the urgent need for stronger and more consistent media literacy provision. Internet Matters Pulse (May 2025, <a href="#">link</a>) shows that 77% of children have experienced at least one harm online, ranging from encountering misinformation to being scammed. Children also consistently tell us they struggle to critically assess the information they encounter. <i>Informed or Overwhelmed?</i> (2025, <a href="#">link</a>) found that 27% of children have seen a fake or AI-generated news story and believed it was true, and a further 41% think they may have done so. Children should not have to navigate these risks alone; media literacy must be built into the services they use to help equip them with the skills and confidence to navigate the digital world safely.</p> <p>This need is heightened by the inconsistency of media literacy education in schools. <i>A Vision for Media Literacy</i> (Internet Matters, 2024, <a href="#">link</a>) found that teaching quality and coverage vary widely by region and school type (described by educators as a “postcode lottery”). Schools and parents cannot, and should not, bear sole responsibility for equipping children with the skills to navigate an increasingly complex digital world. Services have an essential role to play in embedding media literacy principles by design, and Government and regulators should set clear expectations on them to do so. In this context, Ofcom’s proposed recommendations represent an important step toward a more systemic approach that embeds critical thinking and digital resilience skills across the digital ecosystem, ensuring that all children, not just those in better-resourced schools or families, can benefit.</p> <p>We particularly welcome Ofcom’s recognition of the important role of expert third parties in delivering media literacy interventions, and we are pleased that Internet Matters is cited as an example of an organisation well placed to support the UK population. Partnerships between industry, Government and civil society ensure that interventions reach parents, carers and children in accessible and meaningful ways. Users can be sceptical of interventions that come directly from tech companies, so independent third-sector expertise is essential to ensure interventions are credible and effective. Our work</p>

Question	Your response
	<p>with Samsung is an example of a cross-sector partnership that can deliver media literacy interventions directly to families.</p> <p>Internet Matters in collaborating with Samsung have developed <i>The Online Together Project</i> (<a href="#">link</a>), an interactive educational tool that aims to prepare children (aged six and up) for experiences they may encounter online, namely online hate and gender stereotypes. The tool was developed in part because robust studies on gender-based violence among young people have highlighted that programmes targeting attitudes and developing skills over time with multiple methods have the most positive and long-lasting prevention effects (<i>Violence against women and girls in schools and among children and young people</i>, UK Parliament Post, 2025, <a href="#">link</a>). The tool, which was reviewed by experts from Global Diversity Practice and Stop Hate UK, aims to equip children to understand harmful experiences, analyse what they encounter, and communicate safely. It can be used individually or in groups, at home or in the classroom. Feedback in 2024 from 250 parents found over 80% felt the tool helped their child feel more confident and capable when addressing online hate and gender stereotypes.</p> <p>While we broadly support all ten recommendations, several could be strengthened through clearer guidance and additional specificity to better support children and families, as outlined below. Although the recommendations are voluntary, Internet Matters believes that <b>Ofcom’s recommendations should ultimately be made a statutory requirement, at least for categorised services under the Online Safety Act</b>. Embedding these principles in regulation would ensure consistent and accountable delivery of media literacy outcomes across industry, and reinforce the UK’s broader ambition, which was the basis of the Act, to empower users and foster safer, more informed online experiences for all. Therefore, we recommend Ofcom makes this recommendation to Government.</p> <hr/> <p>Recommendation 1: <b>The requirement for services to prioritise “age-appropriate design” is too broad to guide implementation effectively. Ofcom should clarify what this term constitutes, including providing examples for different ages and developmental stages.</b> In doing so,</p>

Question	Your response
	<p>Ofcom could draw on existing frameworks that already segment content and experiences by age, such as the ICO’s Age-Appropriate Design Code (Annex B, Information’s Commissioners Office, <a href="#">link</a>) and the BBFC’s well-established age-classification guidance. These frameworks offer structured, evidence-based approaches to age banding and could help inform clearer, more actionable expectations for platforms when designing age-appropriate experiences.</p> <p>In addition to clarifying what “age-appropriate design” should entail, <b>Ofcom should also note in its statement that certain core product features can actively undermine media literacy by discouraging critical engagement or obscuring how content is shaped and delivered.</b> Features such as infinite scroll and autoplay can limit users’ ability to question information, understand provenance, or apply critical thinking skills. Media literacy efforts cannot be layered effectively on top of design choices that work against them. We therefore recommend that Ofcom explicitly address the role of core design features and set expectations for platforms to minimise or adapt features that reduce user agency or impede critical evaluation.</p> <p>Recommendation 2: The examples Ofcom has cited for recommendation 2, such as providing information through terms of service, are passive and insufficient to help users meaningfully understand or influence the content they see. <b>Ofcom should recommend more active measures, such as regular reminders on how recommender systems operate and clearer explanations of how user choices affect what appears in their feeds. We recommend that Ofcom explicitly require platforms to offer users the right to reset their algorithmic feeds and equip users to do so.</b> Currently, very few children know how to take this step: only 16% of UK children report knowing how to reset their feed (<i>Internet Matters Pulse</i>, May 2025, <a href="#">link</a>). <b>Ofcom could go further by recommending that services provide users with options to only see content from accounts they follow and turn off personalised advertising.</b> These design choices would give families more control over their online experiences.</p>

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	<p>Strengthening Recommendation 2 in this way would not only increase transparency but also support Ofcom’s recommendations on user empowerment, including Recommendation 3. Helping children and parents understand how content is curated and feel confident in resetting or adjusting their feeds may serve as a foundation for empowering people to manage their online experiences and build greater trust in how content is delivered.</p> <p><i>Empower people during use</i></p> <p>Recommendation 3: <b>Ofcom should further strengthen this recommendation by more explicitly recognising the role of parents and carers in helping children manage their online experiences.</b> Ofcom should include a dedicated section on the types of tools and settings platforms should provide to parents and carers, and outline best practice in the design and operation of parental controls.</p> <p>In its consultation on the <i>Protection of Children Codes (Volume 4, 2025, <a href="#">link</a>)</i>, Ofcom indicated that it intends to prioritise parental controls for further consideration. <b>Ofcom should incorporate its findings and associated measures into Recommendation 3 to ensure alignment between the Codes and its recommendations on media literacy.</b></p> <p>Recent developments underline the need for clearer guidance on what constitutes effective parental controls. OpenAI announced parental controls for ChatGPT earlier this year (<i>Introducing parental controls, 2025, <a href="#">link</a></i>). However, the service still allows users, including children, to access ChatGPT without signing up for an account (<i>Start using ChatGPT instantly, 2024, <a href="#">link</a></i>). This design renders parental controls largely redundant, as parents are unable to monitor or manage usage unless their child logs in and uses their account. <b>Ofcom should explicitly discourage such practices and set out clear expectations for parental-control systems to function only within authenticated, linked user environments that enable meaningful parental oversight.</b></p> <p>Recommendation 5: We welcome Ofcom’s recognition of the critical role that parents and carers play in supporting children’s online experiences, and agree that services</p>

Question	Your response
	<p>have an important role to play in increasing the uptake and effective use of parental controls. Data from May 2025 found that 96% of parents are aware of at least one parental control, yet we see a significant difference between awareness of parental controls and usage (<i>Internet Matters Pulse</i>, <a href="#">link</a>). This signals the role that services and other stakeholders must play to increase parents' usage.</p> <p>We particularly support Ofcom's proposal that services provide real-time notifications to parents regarding commercial features and costs. Given the financial risks associated with in-app and in-game spending, Ofcom could consider making this a statutory requirement for larger services under the Online Safety Act.</p> <p>Findings from <i>Internet Matters' Digital Wellbeing Index (2025, <a href="#">link</a>)</i> show an increase in the proportion of children reporting that they have spent significant amounts of money within apps or games, rising from 4% in 2023 to 6% in 2024. We will be publishing updated research early next year, showing a continued increase in the proportion of children spending money within apps and games. Strengthening transparency around commercial features, and ensuring that parents are alerted in real time, would help families manage these costs and support children to make informed choices online.</p> <p><b>Recommendation 6: We strongly support Ofcom's encouragement of platforms to engage with expert third parties. This approach recognises the value of partnerships that extend media literacy interventions beyond the platform environment and reach families through trusted sources. However, Ofcom's framing focuses primarily on reactive support following harm. We recommend expanding this to encourage proactive, educational partnerships that build media literacy skills before harm occurs.</b></p> <p>A recent example of such a partnership is <i>Online Safety Starts Early</i> (Internet Matters and EE, 2023, <a href="#">link</a>), a four-part video series published on Internet Matters' website that is designed for parents, carers and early-years practitioners. The campaign, which we developed in partnership with EE, helps families normalise conversations</p>

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	<p>about online safety at an early age, set up children’s devices securely and introduce good digital habits from the earliest stages of digital life. The campaign aimed to reach parents and early years practitioners before problems arise, and embed media literacy early.</p> <p>We know that parents value enhanced support from third parties. A survey of parents conducted in 2025 found that 42% of parents who visited our website said they talked to their child about being safe online more frequently as a result (<i>Internet Matters Pulse, 2025, unpublished</i>). 39% of parents who visited Internet Matters’ website said they set up parental controls as a result, and 38% said they reviewed their children’s online safety settings. This demonstrates how expert-led initiatives can translate Ofcom’s principles of empowerment and user support into practical action.</p> <p><i>Build trust beyond the service</i></p> <p>Internet Matters supports Ofcom’s proposal for broadcasters and video-on-demand (VoD) services to create or promote content that helps people assess the credibility of information. These services have a wide reach and established public-interest obligations, and are well positioned to contribute to media literacy outcomes through trusted, high-quality programming. <b>However, limiting this recommendation to broadcasters and VoD services overlooks the central role that social media and other online platforms now play in shaping how children and adults encounter, interpret and share information.</b></p> <p>As stated previously, our latest research found that 68% of children and young people who consume news getting their news from social media (<i>Informed or Overwhelmed? 2025, <a href="#">link</a></i>). We found that algorithms play a significant role in who children and young people get their news from. 40% of children and young people who get their news from social media do not follow news-focused accounts, and many children reported that they did not seek out news content, they just come across it in their recommender feeds.</p> <p>Given that social media platforms are the primary source of news for many young people, and given their role in</p>

Question	Your response
	<p>recommending news, excluding these services from Recommendation 7 risks leaving a significant gap in the media literacy ecosystem.</p> <p>Recommendation 8: Internet Matters supports Ofcom's recommendation for services to invest in community-based media literacy initiatives and agrees that trusted relationships are key to effective engagement. We understand from a conversation with Ofcom that this recommendation applies to both offline and online campaigns, but <b>Ofcom's statement should more clearly recognise that online communities can be as effective as offline ones in developing these skills.</b> For many young people, online spaces are where learning, discussion and belonging take place, and recognising these environments would help ensure initiatives reach young people where many already are. This is further demonstrated by the fact Internet Matters has run a number of successful online campaigns in partnership with industry to support children's and families' media literacy.</p> <p>An example of one such partnership is our work with Google, which in 2020 led to the launch of a <a href="#">Fake News and Misinformation Advice Hub</a> on Internet Matters' website. The Hub, which has been viewed over 660,000 times since its launch, provides parents, carers and educators with expert guidance and practical tools to talk to children about identifying false or misleading information (<i>Launch of our Fake News &amp; Misinformation Advice hub, 2020, <a href="#">link</a></i>). The Hub includes a <i>Find the Fake</i> interactive experience with quizzes for children to complete, helping children recognise misinformation in a fun and interactive way. These quizzes can be completed independently by children or collaboratively with parents at home, or used in classroom settings by teachers. In the last six months, our quizzes were accessed over 51,000 times with 60% of users completing the quiz. Together, these resources demonstrate how co-designed, online campaigns can foster critical thinking skills and strengthen families' ability to navigate misinformation - aligning closely with Ofcom's aim of promoting media literacy beyond the service environment.</p>

Question	Your response
	<p>Recommendation 9: We strongly support Ofcom’s emphasis on ensuring that media literacy initiatives are inclusive and responsive to the needs of underserved and diverse audiences. We know that vulnerable children face distinct challenges offline and online. Vulnerable children experience higher rates of harm online, and they are less likely to feel safe online compared to their non-vulnerable peers (70% cf. 79%) (<i>Children’s Wellbeing in a Digital World, Internet Matters, 2025, <a href="#">link</a></i>).</p> <p>We also know that media literacy education in English schools is a postcode lottery (<i>A Vision for Media Literacy, Internet Matters, 2024, <a href="#">link</a></i>), meaning that the children most in need of support, often those from lower-income families or with additional needs, are the least likely to receive it. Our latest report <i>Informed or Overwhelmed?</i> found that children and young people in higher-income households are significantly more likely than those in lower-income households to report that their school or teacher has spoken to them about how to tell whether online news is true (66% vs. 49%) (<i>Internet Matters, 2025, <a href="#">link</a></i>). Children from lower-income households are also less likely to access information from traditional media sources such as television (47% vs. 75%), radio (7% vs. 37%) and print (3% vs. 22%) - sources which are subject to stronger legal and regulatory obligations than social media platforms to provide accurate information.</p> <p>These disparities are mirrored online. Children from lower-income households are less likely to get news on social media via established news outlets (29% vs. 51%) and less likely to follow established news organisations such as the <i>BBC</i> or <i>The Guardian</i> on social media (37% vs. 71%) (<i>Informed or Overwhelmed?, Internet Matters, 2025, <a href="#">link</a></i>). As a result, they are more reliant on unregulated or less-regulated sources and are exposed to a narrower, less reliable range of information. Vulnerable children are also more likely than their non-vulnerable peers to have believed fake or AI-generated news content (43% vs. 23%), and more likely to report that this led to upset (23% vs. 12%) or embarrassment (16% vs. 9%) (<i>Informed or Overwhelmed?, Internet Matters, 2025, <a href="#">link</a></i>).</p> <p>This evidence shows why Recommendation 9 is essential. Without targeted, inclusive and well-designed media</p>

Question	Your response
	<p>literacy interventions, the children most at risk, including underserved and diverse audiences, will continue to face greater barriers to navigating the digital world safely and confidently. Strengthening support for these groups must be a central component of Ofcom’s final statement.</p> <p><b>Ofcom should clarify the media literacy initiatives for vulnerable users should be activated nationally and delivered across both offline and online environments, ensuring that support reaches communities wherever they are.</b> While small, targeted local interventions can be highly effective, they are often difficult to scale and may not reach the breadth of children who would benefit.</p> <p><i>Evaluate what works</i></p> <p>Recommendation 10: Internet Matters welcomes Ofcom’s focus on continuous improvement and evaluation. Embedding robust evaluation practices is essential to ensure that media-literacy interventions are effective, scalable and responsive to emerging risks. <b>Ofcom should highlight the benefit of partnerships between platforms and expert third parties for evaluating media literacy interventions.</b> Independent organisations such as Internet Matters are well placed to help design and test interventions, assess their impact on users, and share evidence of what works across the sector. External evaluation also increases credibility as users are more likely to trust organisations whose media literacy initiatives have been independently reviewed, reinforcing the importance of involving expert third parties. We see this when speaking to teachers who often tell us that resources produced by tech companies may have a hidden agenda and therefore, they sometimes choose not to use them as a result. Partnerships would also help smaller or newer services that may lack in-house evaluation capacity.</p> <p>Lastly, <b>Ofcom could further enhance its proposed statement by clarifying how it intends to measure overall uptake and sector-wide impact of the ten recommendations.</b> Publishing progress reports would highlight where meaningful changes have been made and where further</p>

Question	Your response
	<p>action is needed, while helping stakeholders learn collectively from what works in practice and encourage adoption of recommendations.</p>
<p><b>Question 4:</b> Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.</p>	<p>Confidential? – N</p> <p>We have no further recommendations beyond those outlined in our response to Question 3, which suggests ways to strengthen Ofcom’s current recommendations.</p>
<p><b>Question 5:</b> Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Confidential? – N</p> <p><b>Ofcom should introduce an accountability or progress-tracking framework, such as an annual report/state-ment or periodic review highlighting where progress is being made and where further action is required.</b> This could mirror Ofcom’s approach to violence against women and girls (VAWG), where the regulator has commitment to publish an assessment of how providers are keeping women and girls safer on their services around 18 months after publication of its final guidance (<i>Ofcom’s approach to implementing the Online Safety Act</i>, Ofcom, 2025, <a href="#">link</a>). A similar approach for media literacy would help highlight good practice and incentivise continued improvement.</p> <p>Additionally, <b>Ofcom could complement the recommendations with practical support and reporting.</b> For example, Ofcom could publish case studies showing how different types of services have embedded media literacy principles effectively. Practical examples would help smaller or emerging services understand how to translate Ofcom’s principles into action. As stated in our answer to Question 2, <b>another avenue through which Ofcom can provide practical support is by publishing a list of approved or accredited expert providers who can support services to design, deliver and evaluate media literacy interventions.</b> This would reduce barriers to adoption, particularly for smaller or emerging services that may lack in-house expertise, and ensure that interventions are delivered effectively and to a consistently high standard. Providing a clear set of trusted providers</p>

Question	Your response
	<p>may also help larger services identify the most appropriate partners quickly, and would support quality assurance across the sector.</p> <p>Finally, <b>Ofcom could better emphasise how adopting these media literacy principles can support services to meet their wider responsibilities under the Online Safety Act.</b> In its draft publication, Ofcom has only discussed the Act, in paragraph 2.13, in relation to how the proposed non-mandatory recommendations differ from the statutory requirements under the Act. Positioning the recommendations as complementary to the statutory duties, particularly around transparency, empowering users and mitigating harm, may encourage greater uptake among services seeking practical ways to demonstrate compliance.</p>
<p><b>Question 6:</b> Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment? Please provide evidence in support your answer.</p>	<p>Confidential? – Y / N</p>

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