

Title:

Mr

Forename:

Will

Surname:

Black

Representing:

Organisation

Organisation (if applicable):

Federation of Small Businesses

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: What is your response to this consultation?:

Dear Sir/Madam,

I am writing to you to respond to the consultation into Ofcom's 2015/2016 draft Annual Plan. This follows our previous response to the initial invitation to comment in October 2014.

The FSB is the UK's leading business organisation. It exists to protect and promote the interests of the self-employed and all those who run their own business.

The FSB is non-party political, and with around 200,000 members, it is also the largest organisation representing small and medium sized businesses in the UK.

Small businesses make up 99.3 per cent of all businesses in the UK, and make a huge contribution to the UK economy. They contribute 51 per cent to GDP and employ 60 per cent of the private sector workforce.

When we responded to the initial invitation to comment, we called for Ofcom to ensure that small businesses were recognised within the Annual Plan as an important group of consumers which required further attention. In our letter, we also outlined the importance of seeing that the SME work plan published by Ofcom in September 2014 was delivered.

It is positive to see that Ofcom has taken these calls on board and reflected them within the draft of the Annual Plan. The explicit recognition of small businesses within two of the proposed top priorities is particularly welcome. This change from previous Annual Plans demonstrates real progress in ensuring that the needs of small businesses are being taken into account by Ofcom.

The FSB also recognises the work which has already been carried out by Ofcom for small business consumers. We helped to publicise the SME portal which Ofcom developed and will continue to direct members to this site if they contact us looking for impartial advice. We have also provided evidence about the needs of small businesses to the ongoing investigation looking into this issue, and look forward to engaging with the team once the report is close to completion.

The draft Annual Plan notes that there will be an update to the Infrastructure Report this year. The chapter on SMEs in the 2014 Infrastructure Report was very useful to us and other stakeholders in providing a comprehensive evidence base which complements our existing quantitative and qualitative research.

As a result we would like to see this work replicated within the updated report in order to allow for the monitoring of the connectivity available to the small business market.

It was also positive to see that the 2014 report began examining whether 10Mbps represents a new minimum requirement for sufficient download speed for modern consumers. We agree with the draft Annual Plan that this should be investigated in more detail over the coming year. This was a key recommendation of our recent "Fourth Utility" report.

The FSB is currently developing our own plans for to develop our research into the interaction between the small business sector and the communications market. This work would complement the priorities identified within the draft Annual Plan. We have begun to discuss this with different stakeholders within Ofcom and the Communications Consumer Panel and will be providing more detailed information about our research plans in the near future.

In conclusion, the FSB looks forward to working with Ofcom to deliver the priorities identified within the draft Annual Plan. The importance of communications services to our members and the wider business community is well established. The work identified within the draft Annual Plan will provide a real opportunity to ensure that small businesses are able to confidently use the services they need to compete in the global economy.

We trust that you will find our comments helpful and that they will be taken into consideration.

Yours sincerely,

Mike Cherry LIWSc FRSA