



**Consumer
Focus**
Campaigning for a fair deal

Consumer Focus response to Ofcom's draft annual plan 2012/13

February 2012

About Consumer Focus

Consumer Focus is the statutory consumer champion for England, Wales, Scotland and (for postal consumers) Northern Ireland.

We operate across the whole of the economy, persuading businesses, public services and policy makers to put consumers at the heart of what they do.

Consumer Focus tackles the issues that matter to consumers, and aims to give people a stronger voice. We don't just draw attention to problems – we work with consumers and with a range of organisations to champion creative solutions that make a difference to consumers' lives.

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Our response

Introduction

Digital and telecommunications services

Consumer Focus welcomes the opportunity to respond to Ofcom's consultation on its draft Annual Plan 2012/13. Since its establishment, Consumer Focus has been an authoritative voice on how the digital and communications markets function in the interests of consumers. We have enjoyed a productive working relationship with Ofcom in this capacity and have engaged with Ofcom on a wide range of relevant issues.

We aim to continue to champion consumers' interests in the digital and telecommunications sectors. We have commented on both Ofcom's proposed priorities and work areas for 2012/13 and in doing so we have drawn on Consumer Focus's involvement and expertise in the telecoms policy area. We have also included suggestions of policy areas which Ofcom should pay attention to, given their principal duty is to further the interests of UK citizens in relation to communications matters as well as to promote competition within the communications market. We have commented on Ofcom's proposed working areas in the digital and telecommunications sectors as follows:

- Promote effective choice for consumers by ensuring that clear information on services, price and quality is available
- Develop and implement policies that will improve the ease of switching between communications providers
- Access the provision of communications services in the nations
- Contribute to the Government's Communications Review
- Implement new regulatory framework for non-geographic calls
- Monitoring approaches to traffic management to ensure innovation for consumers

Postal services

Since vesting of the Postal Services Act 2011 Ofcom has also added postal regulation to its already extensive portfolio of responsibilities. We believe that Ofcom's wide experience of regulating across the communications sector has positive implications for postal consumers, particularly at a time when e-substitution is having a clear impact on mail volumes. Ofcom now faces the challenge of ensuring that the universal postal service meets the needs of consumers while being sustainable, efficiently provided and affordable. Ensuring that the correct regulation is in place to meet this challenge represents a considerable new burden for Ofcom, but also the chance for it to broaden its horizon across the communications sector.

Consumer Focus is keen to share our considerable expertise with Ofcom to ensure that consumers are at the heart of the new regulatory regime. We established a close working relationship with Postcomm, the previous postal regulator, and are keen to ensure that the benefits to consumers that flow from such a relationship continue. We have a full programme of relevant work that we will be conducting over the next year that we will be happy to share with Ofcom.

For postal services we will focus our response on Ofcom's Strategic Purpose 3: Help communications markets work for consumers. We also highlight several other areas of long-standing concern where we would welcome Ofcom's attention as it considers its priorities over the coming year.

Strategic Purpose 3: Help communications markets work for consumers

Promote effective choice for consumers by ensuring that clear information on services, price and quality is available

The revised EU Electronic Communications Framework that was transposed into the UK law in May 2011 aimed to decrease information asymmetry for consumers and improve information remedies, as consumers do not find it easy to make informed decisions and compare services of communication providers. As we communicated previously to Ofcom¹ this is due to several reasons relating to:

- complexity of information
- poor quality of the information provided often containing technical language and jargon
- poor accessibility
- consumers' lack of technical knowledge to interpret the information
- not providing information at all

Therefore we welcome Ofcom's plans to improve information remedies and we recommend addressing the issues listed above. In particular we support Ofcom's plans to include in the work the role of information provided not only by the regulator and product or service provider, but also by intermediaries (eg price comparisons websites) which are increasingly popular among consumers. We look forward to engaging with Ofcom on work in this area.

We also support Ofcom's continuing work to improve information on broadband speeds as this area generates high volume of consumer complaints (as indicated by the recent Ofcom Consumer Experience research²). Although improvements have been made on broadband speeds consumers receive, there is still a very clear gap between the maximum speeds advertised by suppliers and what people actually receive. In our view the problem is unlikely to be alleviated by changes made to the Committee on Advertising Practice (CAP) guidance that requires speed claims to be achievable by only 10 per cent of internet service providers' (ISP) customers.

We also recommend Ofcom link its work on information remedies with addressing the issue of using the term 'unlimited' in advertising of broadband services in relation to traffic management. While we see the rationale for the use of the term 'unlimited' when applied to reasonable traffic management practices that allow the proper functioning of the network, we object to applying the term 'unlimited' to traffic management practices in order to camouflage discriminatory practices arising from anti-competitive behaviour, access restrictions and traffic degradation experienced by the end users.

¹ <http://bit.ly/yvnhef> (PDF 411KB)

² The most commonly experienced problem in the internet market is broadband speed being slower than expected, with 30% of internet users experiencing this. Source: [The consumer experience](#). Research Report, Ofcom, December 2011, p.137

In addition we support Ofcom's plan to continue its programme of releasing complaints data about services and communication providers, although we urge Ofcom to continue its work in relation to the effectiveness of the redress in the communications markets. In particular we encourage Ofcom to monitor the impact of changes made in 2010/11 to improve consumer experiences of redress mechanisms, and if necessary introduce further changes.

Develop and implement policies that will improve the ease of switching between communications providers

According to the recent report, *The consumer experience*, published by Ofcom, switching in the communications market is low even by comparison to other service markets in which consumers perceive switching as challenging³. Therefore we support the work that Ofcom is planning to undertake to make it easier for consumers to switch communications providers. We remain committed to working with Ofcom to bring about positive changes for consumers, and in facilitating a switching process which is clear, straightforward and safe, and improves the information available to consumers. In particular we support Ofcom's proposals on the introduction of gaining provider-led (GPL) switching processes, announced recently in its switching consultation⁴. GPL switching processes are likely to minimise switching costs, limit disruption of service, encourage effective competition and, more importantly, also improve the consumer experiences, as opposed to the existing losing provider led processes (LPL).

Access the provision of communications services in the nations

While we support Ofcom's programme of research to monitor citizens' and consumers' access to communications services, these need to be twinned with projects that focus on take-up of communications services, in particular broadband. For example, according to Race Online there are still 8.4 million adults in the UK who have never used the internet⁵. We suggest Ofcom addresses the issue of broadband take-up and develops joint work with other stakeholders who are active in this field, such as Race Online.

Secure the provision of the universal postal service and determine the needs of postal users

Ofcom states that it intends to undertake four pieces of work over the coming year to help with its duty to secure the universal postal service. These are:

- monitoring Royal Mail's performance, particularly its provision of the universal service, efficiency, profitability and pricing
- monitoring the affordability of stamps for vulnerable consumers
- assessing margin squeeze
- evaluating the costs to Royal Mail of notifying the market when it changes its products

What links these pieces of work is their focus on monitoring Royal Mail's performance and behaviour. We know that Ofcom recognises how useful transparent and accurate information can be for consumers in the context of service providers outside of post.

³ The consumer experience. research report, Ofcom, 6 December 2011, p.103

⁴ <http://bit.ly/xAEhoE>; <http://bit.ly/zldgCD>

⁵ <http://bit.ly/ygNiE0>; <http://bit.ly/AmW4Qb> (PDF 48.3KB)

It is a reasonable expectation that this principle of clear and accurate information provision should cut across the wider communications market and form part of any effective postal performance monitoring system. Effective monitoring will be key to maintaining consumer confidence if Ofcom's proposed move to ex post regulation goes ahead, particularly when the move is so rapid. This argument of course extends to the importance of financial performance monitoring and a suitable regulatory accounting framework.

Monitoring Royal Mail's performance

In its recent consultations on Royal Mail's price control and the future regulation of the postal market, Ofcom made clear that it is seeking to reduce the regulatory burden on Royal Mail and allow it greater commercial freedom. It has therefore proposed removing price controls from all of Royal Mail's products apart from a safeguard cap on Second Class letters, and removing some of the reporting requirements on Royal Mail, such as informing the public of its statement of action plan with regards to its compensation scheme.

However, in the light of Ofcom's intention to rely on performance monitoring it is important that sufficient information is provided by the universal service provider and that the monitoring system is robust, credible and instils confidence in the postal market throughout the UK. Ofcom needs to carefully monitor Royal Mail's delivery of the universal service, for example via reports on its Quality of Service. Our concern in this area partly stems from a worrying trend in two recent Quality of Service reports and associated press releases in which Royal Mail self-adjusted or obscured its results. We are concerned that this practice leaves consumers confused about Royal Mail's true delivery and collection performance. I would draw your attention to Royal Mail's approach to reporting the two most recently published sets of data (full year 2010/11 and Quarter 1 of 2011/12).

Full year 2010/11: Force majeure

Across the UK in 2010/11 Royal Mail failed to meet its Retail First Class delivery target by 1.6 per cent, achieving 91.4 per cent against a target of 93 per cent for Retail First Class post delivered the following working day. However, Royal Mail released 'adjusted' figures stating that it achieved 93 per cent and thus met its target; it justified this adjustment citing the poor winter weather and volcanic ash which disrupted mail services. It also stated that it intended to ask the then regulator, Postcomm, to confirm these adjusted figures. Postcomm accepted some of the adjustments in its response to the force majeure application Royal Mail subsequently submitted. However, the finalised figures show that Royal Mail achieved 92.6 per cent for Retail First Class and so did not meet its 93 per cent target, although it is not liable for a revenue reduction. This was the first time that Royal Mail published 'self adjusted' figures in this manner; it had previously published only the unadjusted figures in line with its regulatory requirements.

We accept that the discrepancy between the figures presented by Royal Mail and the finalised figures was small. However, this discrepancy represented the difference between Royal Mail achieving its target performance and it failing to do so. It is important that the public has confidence in the data that Royal Mail publishes regarding its performance, and this requires the most accurate information to be available at all times. We believe that public confidence will be boosted if Royal Mail publishes only unadjusted figures until and unless the regulator accepts any adjustments. It is particularly important that a virtual monopoly provider of an essential public service presents its Quality of Service data in a way that helps consumers and the wider public to properly judge its performance.

Quarter 1 of 2011/12: Additional data

Unfortunately, this is not the only time that Royal Mail has presented its Quality of Service figures in a way that reduces clarity for consumers. In Quarter 1 of 2011/12 Royal Mail failed to meet its First Class target by 1.6 per cent, but this failure was only presented after unverified Quarter 2 figures showing that it had hit its First and Second Class stamped mail targets for the five-week period up to the first half of July. Once again this gives the public a misleading impression of Royal Mail's true performance, and suggests that Royal Mail is establishing a pattern of obscuring its performance data.

Royal Mail is a trusted provider of communications and logistics services across the UK and beyond, and it risks losing public confidence if this pattern is not broken. In an age of increasing openness it does not serve the interests of Royal Mail or its consumers if its performance results are presented in anything other than the most transparent manner possible. Ofcom needs to assess whether the reduced monitoring requirements proposed in recent consultations are sufficient to enable public scrutiny of Royal Mail.

Monitoring affordability

In March 2011 Postcomm published a report on the affordability of universal service products. The requirement for universal service products to be affordable comes from EU and UK legislation and this document had been anticipated for a considerable length of time, but it was lacking in detail and depth, particularly for business consumers. We will therefore be very interested in any follow-up work that Ofcom conducts in this area.

In the light of its proposals to remove price controls from almost all universal service products, monitoring affordability must be a priority for Ofcom. Consumer Focus recently commissioned research examining how domestic consumers might react to stamp price increases in the context of potential rises following the price review.⁶ The research indicated that vulnerable low internet users are relatively unlikely to switch away from mail products when compared with consumers who have access to online alternatives, and as a consequence are more likely to be captive to price increases.

We concluded that while affordability may not be an issue at present, the 'switching' behaviour demonstrated in the research suggests that value for money is a key concern for consumers. The research found a number of 'tipping points' where prices reached a level that caused a significant number of respondents to choose an alternative service, indicating the point at which consumers no longer considered that the service represented value for money. As a consequence we believe that further considerations around value for money, as well as affordability, are necessary to avoid prices reaching a level at which a large number of consumers abandon mail, with the attendant loss of volumes damaging the universal service and leaving vulnerable low internet users (who lack alternatives) to bear the brunt of price increases.

We therefore urged Ofcom to implement a safeguard cap across all Second Class products to ensure that vulnerable and low internet users are not left to bear the brunt of price increases, and recommended that it continues to monitor affordability to ensure this does not become an issue for those consumers who are unable to use alternative methods to mail. Any system developed to monitor the affordability of stamps to vulnerable consumers must ensure adequate protection for this group and should be based on reliable evidence of what is affordable.

⁶ Consumer Focus report on potential impacts of stamp price increases on consumers – A supplement to the Consumer Focus response to Ofcom's consultation, January 2012, <http://bit.ly/Ac5r6x> (PDF 789KB)

A consumer may have to use a service that they feel is unaffordable because they have no reasonable alternative, and Ofcom should strive to understand the behaviour of this group of consumers.

Postcomm's work focused on the affordability of First and Second Class mail. However, it did not assess the affordability of registered and insured products, although both EU and UK legislation specifies that these must be affordable. Currently these services are bundled with a next-day guarantee and signature on delivery in Special Delivery, which costs a minimum of £5.45. We question whether Special Delivery is the most appropriate way of delivering affordable registered and insured services, and we urge Ofcom to consider the affordability of all universal services products in any review.

For businesses the issue of affordability is also pressing. In its affordability report Postcomm stated that its affordability test would be unworkable for businesses as price rises will always affect some businesses, and it did not attempt to address this issue further. Affordability is particularly important for small and medium-sized enterprises (SMEs) as they are more likely to send larger amounts of post than residential consumers and they cannot absorb price rises in the way that larger businesses are able to do. They also have more difficulty than larger businesses in finding an alternative postal provider in the event of damaging price increases. We believe SMEs would welcome Ofcom's reassurance that their concerns have been noted.

Margin squeeze

We note that Ofcom is implementing a margin squeeze test to assess whether Royal Mail is acting in an uncompetitive manner towards its upstream competitors. The margin squeeze test will be assessed on a basket; there will also be a price point control on individual contracts.

We have concerns that a move to assessing headroom on individual contracts could provide Royal Mail with incentives to manipulate information asymmetry and abuse its negotiating power with individual suppliers. We also have concerns that Ofcom wishes to move to monitoring of margin squeeze based on long-run incremental costs (LRIC) by 2014/15. LRIC is a complex cost model that requires robust, detailed financial information, and we have not yet seen any evidence that Royal Mail will be willing or able to provide such data.

We urge Ofcom to be vigilant in its monitoring of Royal Mail's behaviour and finances, and demonstrate that it can obtain the detailed financial statements from Royal Mail it requires before a move to any new monitoring regime.

Royal Mail's market notifications

We believe that Royal Mail should not be burdened by unnecessary requirements to publicly notify the market of changes to its products. For example, we agreed with the proposal in Ofcom's regulatory review consultation to reduce the notification period for changes to the list of Royal Mail's universal service products to one month because we believe this still provides sufficient notice to consumers. However, Ofcom needs to carefully consider the impact of removing market notification requirements from Royal Mail because for many products it retains a powerful position in the postal market. In particular, consumers who depend on the universal service need to be kept informed about any changes that the universal service provider makes to products or services on which they rely.

Ofcom needs to consider the cost to postal users of Royal Mail not notifying the market of changes to its products. For example, SMEs that use metered mail are likely to be particularly vulnerable to reduced notification requirements because they send substantial volumes of post but do not enjoy easy access to competing postal operators in the event of any changes being non-beneficial. Ofcom needs to bear in mind the impact on vulnerable groups such as this before it comes to any decisions. It should also take a more holistic view of the costs and benefits of market notifications, which can of serve to help prevent issues arising at an early stage for both consumers and Royal Mail.

We note the concerns of access operators around the changes to notification arrangements and believe that Ofcom should consult and work closely with these access operators to ensure that any such arrangements do not negatively impact their ability to compete with Royal Mail in the upstream bulk mail market.

User needs review

The Postal Services Act 2011 requires Ofcom to conduct an assessment of user needs in relation to postal services within 18 months of receiving responsibility for postal regulation. We understand that Ofcom intends to conduct trade-off research similar to that undertaken by Consumer Focus and Postcomm in 2010 to explore consumers' needs from the postal services, rather than their wants. It intends to supplement this with deliberative research to delve deeper into consumers' views of the universal service.

We have already responded directly to Ofcom's request for input on its proposals, in which we recommended that Ofcom considers testing consumers' responses to more radical changes to the universal service, and that it needs to take care with the timing of the research in the light of potential price rises. We also signalled our intention to carry out exploratory, qualitative research to provide insight into what motivates consumers when they choose their communications methods. We intend for this work to be forward looking to determine how consumers' needs will change over the medium term. We will continue to work with Ofcom to ensure there is minimal overlap with its deliberative research and that our work is complementary. More widely, we recognise that Ofcom is taking on a difficult task to a demanding timetable, and we are happy to share expertise and offer any insight we can.

Copyright and the Digital Economy Act

In relation to Ofcom's planned work to take forward its responsibilities for implementing a number of provisions under the Digital Economy Act 2010 (DEA), specifically in relation to online copyright infringement, Consumer Focus believes that Ofcom needs to ensure that its work is in line with its general duties. Specifically, its general duty to: '*further the interests of citizens in relation to communications matters*'. We would also like to highlight that the DEA places an obligation on Ofcom not to approve the initial obligations code unless it is satisfied that the provisions of the code 'do not discriminate unduly against particular persons', 'are proportionate to what they are intended to achieve', and 'in relation to what those provisions are intended to achieve, they are transparent.' After nearly two years of work by Ofcom to draft an initial obligations code, Ofcom has yet to publish such an assessment.

We are also concerned that, to date, Ofcom has failed to give sufficient weight to measures designed to protect the rights and interest of consumers. In particular, we are concerned that Ofcom, in its draft initial obligations code, has not made the required provisions on 'the

means of obtaining evidence of infringement of copyright for inclusion in a report' and 'the standards of evidence that must be included', as required by the DEA.

These safeguards were added into the then bill by parliament specifically to prevent large numbers of innocent people being accused of online copyright infringement. Parliament was mindful that the DEA process should not be abused by the likes of ACS:Law, but Ofcom has, to date, refused to make the required provisions on the means of obtaining evidence and the standard of evidence. According to the 2011/12 annual plan it was Ofcom's intention to consult with stakeholders on 'establishing an independent body to hear subscribers' appeals against reports'. We would welcome such stakeholder engagement and we hope that Ofcom will focus its attention on engaging meaningfully with consumer representatives to protect the rights and interests of consumers.

Strategic Purpose 5: Contribute to and implement public policy defined by Parliament

Contribute to the Government's Communications Review

We support Ofcom's engagement with the Government's Communications Review. We look forward to working with Ofcom to ensure the interests of citizens and consumers in the communication sector are properly taken into account in the Review, and that any legislative proposals will deliver a robust protection responding to current and future consumers' needs.

Other work areas for 2012/13

Implement new regulatory framework for non-geographic calls

We support Ofcom's plan to implement the new regulatory framework for non-geographic calls. We have previously communicated to Ofcom about various aspects of consumer detriment in relation to the non-geographical calls market⁷. We hope that the new regime will reduce consumer detriment and we look forward to working with Ofcom in this area.

Monitoring approaches to traffic management to ensure innovation for consumers

The aforementioned recently implemented revised EU Electronic Communications Framework set the new transparency rule that requires ISPs to inform consumers about the nature of the service to which they are subscribing, including traffic management practices. The new law also allows Ofcom to set the minimum quality of service to ensure citizens' access to the 'best-effort' internet. We therefore support Ofcom's plans to carry out work in this field.

In particular further work is required to develop adequate and effective information remedies that work for consumers. Our research into consumers' understanding of traffic management indicates limited awareness of the term 'traffic management' even among tech-savvy users⁸.

⁷ <http://bit.ly/A3y1fp> (PDF 328KB)

⁸ Research carried out for Consumer Focus by RS Consulting in November 2011 on a sample of 32 broadband users that included fixed line broadband, mobile and bundled subscribers. Summary of research findings is included in our response to the Broadband Stakeholder Group on the implementation of the traffic management transparency code <http://bit.ly/AvAmHQ> (PDF 2.38MB)

This finding is in line with results of an omnibus survey carried out on behalf of Consumer Focus by ICM Research⁹ showing that 45 per cent of respondents had never heard of this term before and 21 per cent have heard the phrase but did not know what it meant (see table 1).

Table 1: Are you familiar with the phrase ‘traffic management’ in the context of broadband?

| | Total | Total % | Dial up % | Broad band % | Mobile broad band % | Broad band bundle % | Other % | No internet % |
|---|--------------|----------------|------------------|---------------------|----------------------------|----------------------------|----------------|----------------------|
| Yes, I know exactly what it means | 172 | 8% | 26% | 11% | 2% | 6% | - | - |
| Yes, I have a rough idea what this means | 535 | 26% | 10% | 28% | 21% | 25% | 70% | 18% |
| I have heard this phrase but don't know what it means | 426 | 21% | 23% | 18% | 30% | 23% | - | 11% |
| No, I have never heard of this before | 915 | 45% | 41% | 44% | 47% | 45% | 30% | 72% |

Base: All respondents

We are concerned that awareness is unlikely to increase in the short term due to the opaque and inconsistent way the information is presented, as evidenced by our research. In our view without explaining traffic management, and its impact on the user experience, any information currently provided is not meaningful to consumers and not taken into consideration. We therefore suggest Ofcom links its work on transparency of information on traffic management with its consumer information remedies project highlighted in the section Strategic Purpose 3, para 4.23, especially focusing on the following issues:

- Information accessibility and comprehensibility
- Consistency of terminology and information formats applied across the market by ISPs and third parties ie comparison websites
- Communicating information on managed services
- Verification of information provided by ISPs and third parties

We look forward to continuing our engagement with Ofcom on this issue.

⁹ ICM Research omnibus survey carried out on a sample of 2,048 people between 7 and 8 December 2010

In addition we propose Ofcom addresses issues of discrimination and quality of service, as our research indicates that transparency alone is unlikely to become a sufficient driver to safeguard competition in the broadband market.

Although we support Ofcom's plans to continue its engagement with ongoing Body of European Regulators for Electronic Communications (BEREC) work on discrimination and quality of service, it does not preclude Ofcom from driving these policy issues in parallel at the national level. For example, Ofcom could consider utilising the existing Broadband Stakeholder Group on traffic management to develop workstreams in these areas and engage with stakeholders.

Mobile payments

Some responses to the Department for Culture Media and Sport open letter on the Communications Review in the Digital Age indicated that mobile payments should be examined in the context of the Government's Communications Review. A Consumer Focus survey¹⁰ on payment methods used by consumers in the UK which was carried out in March 2011 showed that mobile payments are increasing in popularity among consumers, with 34 per cent of consumers stating that they used their mobile phone as a payment method. This figure was even higher among 18–24 years old (46 per cent). While the rise of mobile payments can benefit consumers as it offers consumers more convenience and introduces more competition to the payment market, we are concerned as to whether this new form of payment guarantees consumers sufficient protections from the consequential loss of unauthorised mobile use and high frequency of mobile theft, fraud and unauthorised payments. We therefore suggest that Ofcom works with other regulators in this area, including PhonepayPlus, the Office of Fair Trading and the Financial Service Authority, to map any potential consumer protection and enforcement gaps.

Access to the universal postal service

The Government access criteria for minimum levels of geographic post office provision require a larger branch network, approximately 7,500 branches, than would result from the regulatory conditions. However, it is possible that Universal Service Obligation (USO) technical breaches may occur, on a localised basis or potentially on a more widespread basis, because Post Office Locals may not always offer larger parcel services (typically over 6kg). 2,000 sub post offices are due to be converted to the Post Office Local operating model from summer 2012. Although all Post Office Locals should offer the full range of universal service parcel products, Consumer Focus research has found that approximately 50 per cent of branches participating in the pilot of this operating model do not offer large parcel services on a de facto basis, and it is unlikely this issue will be resolved without Post Office Ltd committing to a significant investment in its quality control processes.

The forthcoming restructure programme will have further implications for access to mail services; for example, it is not currently envisaged that Local branches will offer the Local Collect service. This means consumers who currently use their existing sub post office to access this service will have to use an alternative branch, if it is proposed to convert to a Post Office Local format. Consumer Focus will monitor the roll-out of Post Office Locals, starting from 2012, and will use geographic information system (GIS) monitoring data to analyse service gaps and report any potential USO breaches to Ofcom (and any breaches of the Government access criteria to the Department for Business, Innovation and Skill).

¹⁰ ICM Research Omnibus Survey carried out on behalf of Consumer Focus, 18–24 March 2011

Another important source of access to the universal service is via the network of postboxes. We would be very keen to be involved in any re-assessment of the current level of postbox provision because postboxes provide a communications lifeline for those living and working in rural and remote areas.

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