

ACOD response to the Draft Ofcom Annual Plan 2012 -2013

1. ACOD welcomes the opportunity to respond to the draft Ofcom Annual Plan for 2012-13, and as in previous years, we appreciate the efforts of the Annual Planning team in engaging with ACOD throughout the Annual Plan process.
2. Priorities for ACOD in the year ahead include Post, Local TV and access services as well as fault repair processes. We also remain interested in issues around unsolicited calls, from cold calling through to silent calls. We note that Ofcom has made real progress in tackling silent calls, but we think that more work could be done to promote services such as the Telephone Preference System (TPS) to raise awareness - through effective consumer information – about the availability of the service.
3. We are pleased to see that Relay Services remains a priority for Ofcom. ACOD recognises that this is a challenging area, but we are encouraged by progress to date and support Ofcom’s approach in this arena.

As we have previously noted, current services are very old and have been superseded by a range of other more modern technologies. It is important that Relay Service users do not fall even further behind in terms of the technology available to them and that they continue to enjoy equivalence.

The introduction of enhancements to existing provision (e.g. next generation relay, speech to text, and video relay services,) should be introduced as soon as is viable. We look forward to seeing further progress in this space in the coming year.

4. Aligned to this, but not exclusive to it, ACOD remains interested in Ofcom’s duty on accessible terminal equipment, and this is an area where we will continue to encourage Ofcom to use its influence. This is an area which the Committee has explored in some detail previously and we would reiterate our views about the importance of usability and inclusive design for all consumers, especially the older and disabled demographics.
5. Last year, we welcomed Ofcom’s on-going commitment to tackle “not-spots”, given that many of these areas are rural – areas where older consumers tend to disproportionately located. Therefore, not-spot issues continue to be of interest to the Committee.

The proposed priority - looking at the “availability of communications services in the Nations” - is in our view, a natural extension of this “not spot” work.

We hope that consideration can be given to broadening the scope of the project to include the disadvantaged groups of older and disabled people, for example by segmenting Nations data by age or disability.

6. Issues such as “not spots” as well as the need for high and consistent broadband speeds will become increasingly important as trends such as telehealth and telecare continue to become more mainstream.

ACOD has highlighted this previously e.g. in our report on the services that super-fast broadband could deliver which would benefit older and disabled people.

(See: <http://www.ofcom.org.uk/about/how-ofcom-is-run/committees/older-and-disabled-people/research/>)

ACOD remains keen to ensure that this future gazing activity is not lost so that Ofcom is well informed about new products and services which may be delivered via communications networks.

In particular, this means Ofcom working to future proof regulation to ensure that there is the right regulatory framework in place to accommodate new and emerging services, as well as more established ones.

7. Similarly, we would encourage Ofcom to continue to conduct research into the needs and behaviours of older and disabled audiences (or segments there within) especially as these audiences often consume media and communications in a different way to other demographics.

This is especially important given that fact that not all older and disabled audiences are the same. Younger disabled people, for example, often have very different communications needs and habits when compared to the needs of older disabled consumers.

Therefore, we would encourage Ofcom to segment these audiences where possible. This will help Ofcom in its work to support Communications Providers in ensuring that they provide information for consumers which reflect the needs of people with different impairments.

8. ACOD Moreover, we recognise that there are areas where Ofcom does not have the power to act and where such research may therefore be out of scope. We believe that the Annual Plan would be strengthened if it also referenced these areas, so that stakeholders are in no doubt about Ofcom's priorities and those areas where Ofcom has no statutory role.
9. Finally, ACOD has previously welcomed the excellent work done by the consumer team in – via a mystery shopping exercise -to explore whether telecoms providers were fulfilling their obligations to support older and disabled consumers by mandated means such as priority fault repair, large print bills etc.

We would encourage Ofcom to revisit this work during the next year, and on a regular on-going basis, to see if their earlier intervention has resulted in a positive step change in behaviour from these providers.

ACOD appreciates that these activities are expensive and time consuming, but they have the benefit of providing valuable insight into industry behaviour, insight which can otherwise be much harder to quantify. A regular undertaking of this type of research, along with the publication of its findings, could be invaluable for consumers and business like.

10. Thank you for taking the time to read our submission. We would be very happy to discuss our views and opinions in more detail should this is welcome, and we look forward to seeing the final version of Ofcom's Annual Plan upon publication.

Jo Connell, Chair ACOD, 13th February 2012