

Title:

Mr

Forename:

Tony

Surname:

Shiple

Representing:

Organisation

Organisation (if applicable):

PhoneAbility

What do you want Ofcom to keep confidential?:

Keep nothing confidential

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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Comments:

PhoneAbility welcomes the opportunity to comment on this further consultation on Mobile services. Our main area of concern is the ease of access to these services for disabled and elderly people. We note, and agree, that Ofcom has limited powers to require additional services (such as improved relay services) or to influence the provision of more accessible terminals, as these are matters covered by EU legislation. We will continue to urge the extension of scope of universal service to cover the mobile sector, with greater freedom for national regulators to mandate certain types of service for disabled users. In this respect, we want to emphasise that universal service is not simply about universal availability of

mainstream services, in which we believe that the sector has performed well, but is also about the introduction of more specialised services to suit those would-be users who have difficulty in accessing mainstream offerings.

Question 2.1: Do you agree with our principles for mobile regulation?:

No comment

Question 3.1: Are there any additional sector trends that we should consider in our analysis?:

No comment

Question 3.2: Have we identified the right regulatory challenges?:

No comment

Question 4.1: We have outlined a number of factors which may affect the future market structure, including network sharing, spectrum and potential consolidation. Do you agree with this assessment, including risks and benefits that we have outlined?:

No comment

Question 4.2: you see any risks to competition that we have not highlighted?:

No comment

Question 4.3: Do you agree that a market review in the mobile sector (other than in the call termination market) is not currently required?:

No comment

Question 4.4: We have concluded that competition in the mobile sector is currently addressing access concerns adequately. Do you agree?:

In respect of availability, yes. There are access concerns for disabled and elderly people which have been poorly addressed, if at all, and we wish to see an extension of scope for universal service provisions to cover these gaps.

Question 5.1: Do you agree with our assessment of investment in the UK mobile market and our priorities to secure future efficient investment?:

No comment

Question 6.1: Ofcom considers that regulatory intervention to protect and empower consumers continues to be needed in the mobile sector and that competition alone is not necessarily sufficient to secure this. Do you agree?:

We agree, especially for disadvantaged consumers.

Question 6.2: We believe that the approach we take to consumer protection and empowerment in the mobile sector strikes the right balance between taking timely action when necessary, and the need to apply regulation only when effective and proportionate. Do you agree?:

See response to Q4.4

Question 6.3: Are there any areas relating to mobile services that Ofcom is not currently addressing but which it needs to address in order to achieve its consumer policy objectives? Are there other areas where regulation could be scaled back? :

See response to Q4.4

Question 8.1: Do you agree that our proposed facilitation role around mobile not-spot issues is a realistic and sensible thing to do?:

No comment

Question 8.2: Do you agree with our general approach set out in the table above? Are there are any other actions we should take and why?:

No comment

Question 9.1: Are there any additional issues about mobile content and accessing content via mobile that should be considered?:

No comment

Question 9.2: We have set out some differences between accessing content via the fixed internet and via mobile. Are there any further differences?:

No comment