

Title:

Mr

Forename:

Neil

Surname:

Duncan-Jordan

Representing:

Organisation

Organisation (if applicable):

National Pensioners Convention

Email:

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

Question 1: Do you agree that it is helpful and appropriate for Ofcom to issue guidance on the application of the Regulations to consumer contracts for communications services?:

It is helpful that guidance is produced, but the unwillingness by the regulator to enforce issues of fairness and inclusion are a cause for concern.

Many older people find themselves on low incomes, and as a consequence are

vulnerable to companies offering reduced charges - without making it absolutely clear that there will be additional costs in certain circumstances.

Question 2: Do you agree with Ofcom's proposed guidance regarding core terms and transparency?:

No comment

Question 3: Do you agree with Ofcom's proposed guidance (including any administrative thresholds we have set) on non-core terms to which we apply the test of fairness?:

Access to information and communication services is a core part of any democratic and inclusive society. Whilst it may be the case that future generations of pensioners will be computer literate and connected to the internet, around 80% of existing older people neither have, nor in many cases wish, to go online. In addition, around 1 million pensioners manage their finances on a purely cash economy - with no bank or building society accounts and no access to direct debit facilities. These individuals, many of whom are already on low incomes, are therefore being penalised by having to pay additional charges.

The market has already shown itself to be inadequate at removing this unfairness, and therefore Ofcom should instruct providers that additional charges for itemised bills, payment by methods other than direct debit and termination of accounts should no longer be permitted.

Question 4: Are there any other issues that are covered by the Regulations which Ofcom should give guidance on?:

The National Pensioners Convention believes that pensioners should be excluded from standing charges for telephony services.

Additional comments: