



Title: Ofcom's Proposed Annual Plan 2018-19

Contact: Kellin McCloskey

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1. Who we are and what we do?

- 1.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI).
- 1.2 The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers.

2 Ofcom's proposed Work Plan 2018-19

- 2.1 The Consumer Council is pleased to be able to offer comments on Ofcom's proposed work plan 2018-19. We commend Ofcom on its clear and detailed work plan, which gives a helpful description of the breadth and ambition of its work plan. We are particularly pleased to offer comments on the specific work projects as below:

Ofcom NI

- 2.2 We welcome the focus Ofcom NI has placed the important issues for consumers in this part of the UK, namely Brexit, Telecoms and Broadband. Ofcom will be aware that The Consumer Council is keen to support its work, with a particular focus on standard of customer service offered by Telecoms and Broadband providers. We believe with the imminent introduction of a Universal Broadband

Service and the future investment planned for the Telecoms infrastructure here, we believe this is the most important time for both Ofcom and The Consumer Council to work together to achieve greater standards of service for consumers in NI.

2.3 Further, you will be aware The Consumer Council has a wealth of knowledge and research around cross-border postal services. We are particularly aware that Brexit is likely to have a significant impact on this industry. We would therefore welcome further discussion with Ofcom on how we can help contribute to preserving and improving cross-border postal services between NI and Republic of Ireland.

Post

2.4 *Review of the Second Class safeguard caps on Universal Service letters and parcels.*

The Consumer Council believes it is vital to protect consumers from price rises that negatively affect their behaviour or potentially exclude them from using universal postal service products. Ofcom will be aware a recent report¹ by The Consumer Council recommended that Ofcom should look urgently at the cost of sending a second class parcel for vulnerable consumer groups to make sure they are not priced out of this service. Specifically, our report presents an area of emerging detriment especially for consumers with a disability who send parcels. We therefore are keen to work closely with Ofcom as it

¹ [Postal Consumers in NI: experiences and attitudes of businesses and vulnerable consumers to the postal service \(August 2017\)](#)

reviews its second class safeguard cap on universal service letters and parcels to ensure all consumers particularly those who are vulnerable are fully protected.

2.5 Advice on regulation for cross-border parcels

Ofcom will be aware that The Consumer Council has a keen interest in this area following our 2017 Border Post report². Our unique location in NI means we are the only part of the UK to share a land border with another European Country. Therefore, the implementation of agreed measures under the regulation that impacts cross-border parcels will be of importance to consumers in NI. Also and in addition to this, we are keen to work with Ofcom to explore solutions to improving price transparency in the cross-border international parcel market. In particular how best information on tariffs and service provision can be provided to businesses and consumers so they can more easily compare cross-border delivery services and be confident about the service they are purchasing.

General

2.4 UK Communication Market Report and other research reports

Ofcom's research in both its UK Communication Market Report, Connected Nations and Residential and Postal Business Trackers provides invaluable evidence that helps The Consumer Council fulfil its roles. Going forward and if helpful to Ofcom, The Consumer Council

² Border Post – A report on cross border mail delivery (Nov 2017)

would like to offer our insight from a consumer perspective to help input into the design of any future surveys.

2.5 We look forward to continuing to working well with our Ofcom colleagues both locally and nationally in the year ahead.



Floor 3
Seatem House
28-32 Alfred Street
Belfast
BT2 8EN

Freephone: 0800 121 6022
Switchboard: 028 9025 1600
Fax: 028 9025 1663
E-mail: info@consumercouncil.org.uk
Website: www.consumercouncil.org.uk

