

Consumer Forum for Communications

The Rt Hon Jeremy Hunt MP
Secretary of State
Department for Culture, Media and Sport
2-4 Cockspur Street
London SW1Y 5DH

29 June 2011

Dear Mr Hunt

Thank you for the early opportunity to express views on the Government's Communications Review for the Digital Age. Members of the Consumer Forum for Communications, which I chair, have asked me to reply to your Open Letter of 16 May 2011 to signal our strong interest in this Review and desire to be involved in forthcoming discussions. We already have a commitment from your officials to attend our next meeting (on 13 September 2011), and would be glad to welcome you in person on a suitable occasion.

The Consumer Forum for Communications is a civil society umbrella body of more than 40 consumer representative organisations and experts. Members include both large national organisations like Consumer Focus, Citizens Advice, Which?, Age UK and RNID and smaller specialist ones like Privacy International and Wavelength. The Forum started in the late 1990s when our current Communications Act was first mooted, and is currently hosted by Ofcom. Through quarterly meetings and our website, we support members in exchanging information and views on communications issues which affect consumers, with the ultimate goal of ensuring that decision-makers are fully aware of the organisations' policy priorities and views on what will be best for consumers. More information about the Forum is available at <http://www.ofcom.org.uk/about/organisations-we-work-with/consumer-forum-for-communications/>, and I am happy to answer any questions.

In addition to this Forum response, individual members may well respond to your letter. Points which members want to make include:

- The starting point for the proposals in your letter is economic growth. While growth is an important objective, it cannot be the only objective for a fundamental review of this kind. We are sure that in the next round of consultation, Government will want to clarify other objectives – which are likely to include social cohesion, cultural benefits and carbon reduction – and how any proposed action supports each objective. The right starting point for something so far-reaching might be future national well-being.



- We believe that the primacy of consumer and citizen interests (set out in Ofcom’s principal duties in the current Communications Act) has had important positive effects over the past seven years. Your letter states the aim of “a deregulatory approach ... to the benefit of both consumers and citizens, and also industry”. This aim will be best achieved by reinforcing the primacy of user interests. The last seven years have seen the emergence of *users* of communications networks and services as a diverse and potent set of forces, with increasingly varied roles. These include but exceed the previously recognised roles of *consumer* and *citizen* (which respectively drive competition and revenues, and influence political and social outcomes). For example, we also now see users as *content producers* (greatly adding to available content) and *innovators* (helping to shape future uses and services). Users are not only individuals but also businesses and organisations. Service providers recognise the importance of understanding customers’ and users’ needs and preferences in order to serve them properly, and legislative and regulatory frameworks must also do so.
- Your letter goes on to say that the Government “will ensure that Ofcom has the right powers and duties to work in a way that gives businesses confidence in the regulatory system”. Equally, Ofcom’s work must give consumers the confidence that they will be treated fairly and adequately protected – such confidence will not arise from market forces alone.
- We are sure that Government wants the benefits offered by digital communications to be shared by all, irrespective of their resources, abilities, age or other difference. You are undoubtedly aware of the potential of digital communications technologies to neutralise disadvantage stemming from differing abilities, and to overcome social and geographic isolation and other barriers. We hope to see explicit pursuit of relevant goals in your next rounds of consultation. Specifically, it is vital that the future legal framework finally addresses the existing persistent gaps in accessibility. Platforms and services must be made fully accessible and offer equivalent functionality to disabled end-users. And in the excitement of fostering economic growth around new media and the internet, please do not forget the continuing importance for millions of people of plain old telephone service, which still offers unparalleled human immediacy. This basic service must be preserved and accessible to everyone whatever their abilities or resources.

These are all broad general points. We look forward to engaging with you and your officials on more detailed levels as discussions progress.

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