

Communications Consumer Panel and ACOD response to Ofcom's consultation into its Space Spectrum Strategy

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome the opportunity to respond to this consultation on Ofcom's Space Spectrum Strategy.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

We welcome the opportunity to respond to Ofcom's consultation on its choice of strategic priorities covering the use of spectrum by the satellite and space science sectors, namely: broadband, earth observation and existing benefits/sharing.

We are keen to support Ofcom's aim to prioritise in a way that offers the most benefit to UK consumers - including micro businesses - and citizens. The detailed information provided in the consultation document sets out the logic behind the three priorities.

Interactive Data

We assume that the interactive data is not intended to be aimed at consumers or consumer representatives, so we do not comment on that element. Generally, in terms of accessibility of information and for the purposes of this consultation, it would have been useful if the replies from stakeholders to the calls for inputs that informed the choice of strategic objectives had been more prominent - perhaps published as a link on the cover page of the consultation - outside of the interactive data pages. The consultation document sets out the strategic objectives that Ofcom proposes to focus on and does not

summarise the options that Ofcom has considered and rejected. It is only by looking at the responses to the call for inputs that respondents are able to obtain a broader picture in order to form a view on whether the selected priorities are the most beneficial to consumers and citizens. If Ofcom does aim to gain input from those who may not be specialists in the satellite and space science sectors but for whom there may be potential impact - for example, consumers and their representatives - it would be helpful to make the analysis as straightforward as possible.

Industry and technology trends

From the evidence provided in the consultation document, the industry and technology trends seem logical and likely. Demand may increase for high definition television and more channels and this may be balanced in part by improvements in technology, including compression. However, we would be cautious to accept the idea of a widescale move from SD to HD TV; this may have implications on consumers who are still using only SD technology. We note too that some stakeholders felt that HDTV is approaching maturity - so we again urge caution in respect of forecasts relating to this area.

The predicted increase in demand for broadband in a range of locations e.g. on aircraft and at sea seems logical and the benefits to consumers' and citizens livelihoods, lifestyles and safety are clearly set out in the consultation document.

Strategic priorities

We support the three strategic priorities proposed by Ofcom:

Broadband

We strongly support the use of satellite technology to tackle the delivery of broadband to remote rural locations. Help is urgently needed to improve connectivity for the 9% of UK rural premises that are still unable to receive at least 2Mbps and 48% of UK rural premises (approximately 1.5 million households) unable to achieve download speeds of 10Mbps, as highlighted in Ofcom's Connected Nations report 2015.

We would encourage further investigation of easing mobile data "not spots". Data usage "on the go" is burgeoning with, inter alia, growing numbers of consumers undertaking financial and other transactions. Lack of availability - or loss of service midway through a transaction - represents real consumer detriment so we would recommend that this issue feature prominently within the strategy.



The consultation highlights the potential to increase coverage across UK airspace and waterways, which we would support. We encourage Ofcom to continue to focus on the future needs of UK consumers and citizens - future-proofing against problems caused by increasing needs and demands and, as suggested in the consultation document, to liaise internationally to ensure efficient and useful sharing of spectrum.

Having said this, it could be argued that lack of access to broadband while in an aeroplane is essentially a “rich man’s problem”. In other words, while meeting such future needs must in our view be actively pursued the fact is there is real detriment happening here and now - for example, the 1.5 million rural households unable to get download speeds of even 10 Mbps is evidence of widespread consumer harm. So, if anything, we would urge that solving the problems of consumers and citizens on the ground should take priority over those that are in the air. This also meets the criterion of focusing efforts where they can enable the greatest benefits to UK citizens and consumers.

We would encourage Ofcom’s satellite and space science specialists to liaise closely with other groups designing solutions to broadband and mobile coverage gaps, particularly noting the imminent design of a Universal Service Obligation (USO) for broadband.

The Panel has written to DCMS in support of a broadband USO and we welcome initiatives such as the supply of satellite connectivity to those who would benefit from it. However, we are unsure about the take-up and practical impact so far for consumers of the subsidised satellite broadband connection scheme that the Government announced in December 2015. We believe it is vital that this scheme is widely publicised and ongoing costs are addressed for those who might encounter difficulty paying for the service - so that true benefits for consumers can be realised and so that the most can be made of the investment of different players in the value chain for the provision of satellite applications (as illustrated in the consultation document). It is essential that there is no gap between available technical solutions and the consumer experience.

We note that Ofcom currently has no statistics on the number of broadband satellite subscribers, which we found surprising. It seems to us that without such information an important set of evidence in respect of consumer benefit is absent, and this could impact on strategic thinking. We note the proposal to look into finding this information, which we would strongly encourage without delay.

We would underline the importance of coverage to micro businesses. This can be a problem both in rural and urban areas and, when deciding upon strategic options, we would urge Ofcom to consider exploring where satellite technologies may do the most good for the most small businesses.

In respect of satellites we agree with Ofcom's proposal to assess - and where possible within the scope of its powers - to act if necessary regarding "paper satellites". At a basic level, this seems like a market failure that potentially harms consumers.

Earth Observation

We welcome the objective to provide consumers and citizens with better, higher quality information about the world, allowing them to be better informed of extreme weather and benefit from reductions in cost due to better information being available to industry; we note that farming and insurance are cited in the consultation document.

We consider that improvements to broadband and mobile coverage will be vital in making this possible, not least in farming, but also in consumers' access to apps in rural locations. The benefits are set out in the consultation document and are wide-reaching, from life-saving up-to-the-minute emergency information, to understanding the weather - forecasting and preparing for flooding.

Existing benefits and sharing

We note the document's reference to existing benefits for consumers and citizens; we suggest that it may be helpful to further document these benefits in order to ensure that they are not lost or degraded. We agree fully with Ofcom that care must be taken and harm mitigated; and that there should be swift action when problems arise.

We support Ofcom's intention to balance competing demands and tackle interference, with enforcement where necessary.

We agree that Ofcom should keep under review the increased demands that may come from machine to machine communication via the Internet of Things. This is in our view an unknown quantity with potentially far reaching consequences - in terms of consumers' day-to-day lives, their safety and wellbeing and the privacy and protection of their personal data. It is therefore important that the technologies - whatever they may be - that enable the exciting benefits of the Internet of Things are secure and reliable.