

# Response to CAP Consultation on the presentation of mid-contract price rises in telecoms ads

## 17th November 2022

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## Introduction

Community Fibre welcomes the opportunity to respond to CAP's consultation on the presentation of mid-contract price rises in telecoms ads. We support CAP's ambition to increase transparency for the consumer. Consumer transparency has been a value that Community Fibre first launched services in 2013 and continues today as the operator on one of the largest full fibre networks in London.

Community Fibre is future proofing London communities by delivering 100% full-fibre broadband throughout the capital city. By believing in a more inclusive future where everyone has access to better broadband, Community Fibre offers the fastest 100% full fibre broadband in London, with up to 10 Gbps for businesses and up to 3Gbps for consumers, at the most competitive prices on the market. Through offering more reliable and affordable 100% full fibre connections, Community Fibre empowers communities, enabling them to connect with friends and family and access crucial services online.

Community Fibre was named the UK's best Consumer Internet Service Provider for the second year running at the Internet Service Provider Association (ISPA) Awards 2021, in addition to being recognised as the Best Ultrafast Broadband provider and awarded the Social Impact Award. It also won the Scaling Up category at the INCA Gold Awards in 2021.

Currently Community Fibre operates across 30 London boroughs with plans to upgrade 2.2m London properties to full fibre by the end of 2024.

Given our focus on building a network for London our responses will tend to reflect the perspective of a more urban consumers although wherever possible we have tried to consider all types of consumer within our responses.

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## Consultation Questions (in blue) with Community Fibre responses in black

### 1) Do you agree with the guidance principles set out above?

Community Fibre always endeavours to communicate transparently with its current and prospective customers. We also think the guidance should go further to address other elements of broadband advertising that can lead to consumer confusion including:

**Loyalty penalty:** Operators should make it clear to their customers on how much their service will cost once the initial contractual commitment period expires. This information should be available immediately adjacent to the initial price claim.

**WiFi Speeds:** Operators should make it clear to their customers the broadband speeds they can expect to receive using the packaged WiFi router. This information should be available immediately adjacent to the initial broadband speed claim.

**Fake Fibre:** Operators should not be able to promote their service as fibre broadband when the technology used to make the final connection into the consumer's property is not in fact a fibre-optic cable. Such claims are clearly designed to deceive customers with regards to the technology they are receiving and as such should be prohibited under the existing codes.

### 2) Do you agree with taking the same approach to ads for both tiered and variable contracts, in terms of the level of prominence expected for information about mid-contract price increases?

Yes. We understand that some operators may have variable contract price rise clauses 'hidden' in their terms & conditions and it is important that these are presented transparently to the consumer.

### 3) Do you have any comments on the use of terms used to describe rates of inflation such as CPI and RPI, and the level of understanding consumers have of these terms (including when they are referred to using an initialism only)?

We believe that the acronyms CPI and RPI are well understood by the public and are widely used in the mainstream media, as such there should be no requirement to explain them further.

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4) Do you agree with the mitigating factors listed as having the potential to cause an advertiser to take additional action in order to ensure material information relating to in-contract price increases is sufficiently clear?

Yes the objective should be for the marketing materials to be as clear as possible for the consumer.

5) Do you agree that in instances where multiple offers/products appear on one page (for example, on a telecoms provider's own website), it may be sufficient for prices to link or refer to a suitably-prominent single piece of information about mid-contract price increases, rather than including this information within each individual product listing?

Yes, it should be sufficient for prices to link or refer to a suitably-prominent single piece of information about mid-contract price increases.

6) Do you have any other comments or suggestions in relation to the proposals??

As stated above we also think the guidance should go further to address other elements of broadband advertising that can lead to consumer confusion including:

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