

INCA response to CAP consultation on the issue of mid-term contract price rises in telecoms advertising

INCA welcome the opportunity to respond to the CAP's consultation on the issue of mid-term contract price rises in telecoms advertising.

INCA is the trade association representing the independent broadband industry. Its members are supporting, planning, building and operating, sustainable, independent and interconnected full fibre and wireless networks that advance the economic and social development of the communities they serve and permit the provision of applications and services through open competition, innovation and diversity.

INCA has more than 150 members, including: network owners, operators, and managers; access and middle mile networks; public sector organisations actively promoting the development of 21st century digital infrastructure; vendors, equipment suppliers, and providers of services that support the sector.

INCA and its members are heavily engaged with a variety of policy and regulatory debates and initiatives, aimed at empowering consumers to make informed and effective choices, particularly in the context of the challenging external environment and its impact on society at large.

Whilst INCA members will have their respective approaches to various issues, what they all have in common is a desire to rollout high quality, good value Gigabit services to consumers. They all see the positive impact that they can have on consumers, as newer entrants to the market, through offering them a greater choice of services and excellent value for money. These services can often be at a more competitive price and offer enhanced features of speed and reliability, compared to what was previously on offer to consumers before this competition was injected into the market.

As such, INCA broadly welcomes CAP's proposals. INCA members support price transparency as an important part of enabling customers to make informed choices.

However it is vital that the issue of mid-term contract price rises in telecoms advertising sits alongside broader policy reforms that are necessary to support consumers to make informed choices. Crucially operators should not be able to promote their services as fibre broadband when the technology used to make the final connection into a consumer's property is not a fibre-optic cable. Such claims are clearly designed to deceive customers with regard to the technology they are receiving and as such should be prohibited under the existing codes.