

Sir Chris Bryant MP
Minister of State
Department for Science, Innovation and Technology
Email: correspondence@dsit.gov.uk

12th December 2024

Dear Minister

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. I am writing to highlight issues of particular relevance to consumers in Scotland in relation to the migration from the Public Switched Telephone Network (PSTN) to digital landlines.

Consumer Scotland has previously reported on this matter, highlighting greater potential risk to consumers in Scotland, particularly those living in remote and rural areas. This is due to a combination of factors, such as higher levels of landline dependency, poorer mobile signal and a larger number of power cuts which also last longer than the UK average. As a result, a relatively high proportion of consumers in rural areas of Scotland could be vulnerable during the migration.

Due to our ongoing concerns, we have analysed recent data from the Communications Consumer Panel (CCP). This data was the most [recent wave](#) in a series of research by the CCP on this topic. We found that:

- A higher proportion of consumers in rural Scotland say that a landline is their preferred device for making calls at home
- When compared to consumers across the UK, a higher proportion of consumers in Scotland say they would use their landline in an emergency, often due to concerns regarding poor signal or call quality
- In Scotland 34% of respondents indicated that they do not know what the switchover means for them, whilst 22% had not heard about the switchover until they had completed the Communications Consumer Panel survey
- The proportion of respondents reporting at least one power cut in the last 2 years has increased when compared with previous research, with 91% of those in rural Scotland reporting at least one power cut in the past 2 years

We welcome your interest and engagement with this topic and note the positive recent announcements by the UK Government. We particularly welcome the work to better identify and target those eligible for support during migration, the development of a checklist for providers and work being done to ensure the smooth operation of Critical National Infrastructure which relies on telecoms services. We were pleased to see factors which we referenced in our earlier research on this topic being addressed, including reliance on landlines and living in areas with poor mobile signal. The Ofcom [Connected Nations Scotland 2024 report](#) highlights the connectivity challenges faced by consumers in Scotland, with 7% of Scotland being voice and text 'total not spots' compared to 3% of the UK as a whole and 77-80% 4G geographic coverage compared to 88-89% of the UK as a whole. The commitments agreed recently with providers will contribute to mitigating the risk of harm and ensuring that consumers are protected during the migration process.

However, despite this positive progress, we still have a number of concerns about the impact of the migration to digital landlines on consumers in Scotland. While we accept that the current telephone system is in need of replacement, it is essential that the migration is handled carefully to protect consumers. This includes taking account of the risks to those who live in areas where there are more, and longer, power cuts, consumers living in areas where they cannot rely on a strong, reliable mobile signal and those with connected devices such as telecare alarms.

Providers must identify consumers eligible for supported migrations. The CCP's research found that 49% of respondents in Scotland said they were not asked about issues such as health conditions, additional devices or the adequacy of mobile coverage before being migrated to VOIP. This suggests that many consumers are not being asked questions which might highlight a need for additional support. We recommend that further measures are taken to monitor provider's compliance with recent commitments.

We also recommend that further steps are taken to promote partnership working by stakeholders such as local authorities, resilience partnerships, Ofcom and advice bodies. This partnership working should be focussed on ensuring consumers are provided with the information they need. Because the migration is being taken forward by providers at different times, and because of the different technological solutions being adopted by individual providers in relation to battery backup provision, there is potential for consumer confusion. We acknowledge that there are a range of reasons why providers have differing approaches to resilience measures, including differing needs of their consumer base, however these differences pose challenges in developing consistent communication targeted at consumers and advice bodies. More consistency of messaging is needed from providers to support consumer understanding of the migration.

This may be exacerbated where family members help to manage another's affairs. The CCP research found that 36% of respondents in rural Scotland who were aware of VOIP, and who would be required to help someone they don't live with switching over with their landline telephone service, had no idea what they needed to do in relation to the switchover. This is

substantially higher than the 22% recorded for the UK as a whole. This illustrates the need for clear and consistent messaging, in the form of a national campaign to raise awareness of the migration and to highlight the challenges posed.

We consider that a greater focus is needed on rurality and connectivity. These are clear risk factors for consumers in Scotland, particularly for those in remote and rural areas. These risks must be clearly communicated across government and local government, with a focus on staff engaged in social care and resilience. These risks must be adequately reflected in plans for the migration to digital landlines. More winter storms, including disproportionately more severe storms, are predicted in future by the Met Office. These extreme weather events and the impact that they can have on infrastructure means that power cuts and disruption to communications could become more commonplace. We recommend that the Government work with Ofcom and other stakeholders to fully consider the impact, including the compound impact, of resilience factors such as frequency and length of power cuts, poor mobile phone signal and the 3G switch off.

In summary, Consumer Scotland recommends:

- That further measures are taken to monitor provider's compliance with recent commitments in order to ensure that the consumers in need of support are identified
- Partnership working with key stakeholders is promoted to ensure adequate information is provided to consumers. There is a need for clear and consistent messaging, in the form of a national campaign to raise awareness of the migration and to highlight the challenges posed.
- A greater focus on rurality and connectivity as risk factors for consumers, along with the need to consider compound impacts of resilience factors, with these being adequately reflected in plans for the migration to digital landlines

We would be happy to discuss these issues, and my office would be pleased to arrange a meeting or provide further information to you or your officials.

Yours sincerely



Sam Ghibaldan