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Consumer Scotland
Luchd-Cleachdaidh Alba

The Rt Hon Ian Murray MP
Minister of State
Department for Digital, Culture, Media and Sport
100 Parliament Street
London SW1A 2BQ
By email to ps.murray@dcms.gov.uk

11th November 2026

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 seek assurance on measures in place to ensure the greatest possible resilience for our telecommunications networks, and to mitigate the impact of severe weather for consumers across Scotland who rely upon these networks as winter approaches.

In the context of the Public Switched Telephone Network (PSTN) switch off in January 2027, many consumers have been recently migrated to digital lines. We are concerned that this poses additional risks for households of being cut off in the event of a power cut. Consumer Scotland has previously published analysis which highlighted the particular risks for consumers in rural Scotland resulting from the migration. In particular, our analysis highlighted that proportionately more consumers in rural Scotland could be at risk of harm following the migration, as they may be unable to make an emergency phone call, or contact friends and family, in the event of a power-cut. We have also highlighted that, given these factors, the one-hour minimum battery back-up for digital landlines and telephone mast sites may not be sufficient to meet the needs of some consumers in Scotland.

This higher level of risk of harm for rural consumers in Scotland results from a combination of factors including:

- the reliance of digital calling on a power supply
- the prevalence of more frequent and longer lasting outages in rural Scotland
- poorer mobile connectivity and signal quality in these areas
- the longer travel distances and limited public transport options for many consumers requiring access to services in these areas

We have engaged with the Government and industry previously to highlight these concerns and welcome the action that has been taken to date, including the particular communication activity and additional protections intended to support telecare users. We also recognise that industry has

committed to work on delivering back-up solutions that extend beyond the one-hour minimum requirement stipulated by Ofcom.

Despite these important steps, the overall resilience of the telecommunications network in the event of a power cut remains a concern for consumers in rural Scotland. Our particular areas of concern include the following issues:

- **power cuts that affect both digital voice landline services and mobile sites**: during recent storms some customers were without power for a number of days. In some instances mobile sites were also affected. Ofcom analysis of network data shows that following storms, 85% of customers are reconnected within eight hours, and 98% of customers are restored within 25 hours. These time periods extend significantly beyond the prescribed battery back-up time of one hour, or even the four hours that some providers have committed to.
- **consumer communication and understanding**: our recent engagement with stakeholders has highlighted that there can still be uncertainty amongst consumers about the implications of the digital voice migration. Many consumers will have been recently migrated to digital lines and may be unaware that they may be cut off in the event of a power cut, which is of particular concern as the winter approaches.
- **changing consumer circumstances**: consumers who previously did not possess characteristics putting them at higher risk may develop these following their migration to a digital line, which may lead to greater risk in the event of a power cut. Consumers may not be aware for example that they need to contact their provider to ensure they have adequate back-up equipment in place.

We would therefore welcome any reassurance you are able to provide that storm preparedness plans across Government, industry and regulators have taken into account the resilience implications of the switch to digital lines on households' connectivity in the aftermath of severe weather incidents.

In closing, I would like to also take this opportunity to bring to your attention a report Consumer Scotland has recently published on equitable access to broadband and mobile telecommunications services in Scotland. The report includes a section on infrastructure resilience and also covers connectivity, legacy systems transition, consumer protection, inclusion and affordability. The report contains 12 recommendations in total which I have included in full as an annex to this letter, a number of which are for the UK Government and Ofcom to consider.

We would be delighted to discuss the issues raised with you or your officials at your convenience, should that be helpful.

Yours sincerely



Sam Ghibaldan

Annex

Connected Consumers: Making telecommunications markets work for consumers in Scotland – Recommendations

Connectivity

Recommendation 1: Consumer Scotland recommends that Ofcom and the UK Government ensure that the Broadband USO review commences promptly in 2026. The review should:

- commit to raising the speeds specified in the USO to at least Superfast level
- take a technology agnostic approach to how the USO can be fulfilled, drawing on the possibilities offered by the rollout of satellite technology, standalone 5G and 6G mobile services
- continue to include reference to affordability measures as part of the USO criteria to ensure services are accessible to as many consumers as possible and to prevent detriment

Recommendation 2: Ofcom should:

- continue to monitor access to any revised USO, reporting on coverage by nation, and local and constituency areas, and with coverage also broken down by rural and urban areas
- extend consumer facing information to include information on when various technologies are expected to be available to consumers, based on their postcodes. This information should draw together work by providers and by both governments to provide a more comprehensive picture than currently exists, across a wider range of technologies and expressed in more accessible ways

Recommendation 3: The Scottish Government should refresh Scotland's Full Fibre Charter in the light of any revised USO obligation and planned network deployments by providers, clearly identifying the actions it will take to improve connectivity, whether alone or working with partners.

Recommendation 4: Following the publication of the most recent work on planned network deployments, and the conclusion of the Mobile Markets Review, Ofcom should establish nations-level benchmarks for mobile performance to accompany its proposed 90% UK benchmark to ensure delivery of significant performance improvement in Scotland and the other UK nations. The Scottish and UK Governments should work together to identify and agree priority areas for further investment both by providers and governments to meet these benchmarks.

Legacy technology and network resilience issues

Recommendation 5: In the lead up to the 2G switch-off, Ofcom should undertake active monitoring of consumer awareness of the changes. Where awareness levels are low this should trigger further, government backed, communication measures both directly to consumers and through trusted intermediaries to raise awareness, as has been the case with digital calling.

Recommendation 6: Ofcom should set out a detailed timetable for concluding its engagement with providers and power distribution networks to assess which sites are most at risk of continuing outages. Following this the regulator should set out a plan of action, by the end of 2026, to ensure that the effects of outages on consumers can be reduced.

Consumer Protection

Recommendation 7: Ofcom should:

- undertake further research on consumer understanding of pricing practices and other key contractual provisions
- monitor switching, price and other recent reforms to ensure that they are effective in protecting consumer interests and publicly report on the actions they will take to ensure this
- consider how to give consumers more information about their usage so that they have more control when negotiating contracts
- consider whether assisted digital services could help consumers who are not currently engaged in switching or who have trouble resolving issues with providers

Recommendation 8: Ofcom should urgently refresh its guidance on supporting consumers in vulnerable circumstances. This guidance should build on the Charters developed by the UK Government and:

- set out protocols in relation to provider practices on issues such as pricing and contractual terms and debt recovery practices
- define Ofcom's approach to how consumers can be supported to share relevant information about their needs with providers and Ofcom's expectations of how providers will respond to these disclosures
- take account of best practice in sectors such as energy and financial services.

Recommendation 9: Providers should be required to provide consumers with advice on their usage and on the best available deal across a wider range of communication channels, including any app or website accounts, to ensure the contractual process better meets consumer needs.

Inclusion and Affordability

Recommendation 10: The Scottish Government should address issues around access to services in its work on digital inclusion and on public service reform. It should:

- ensure that reform of public services delivery is rigorously impact assessed and user tested to ensure inclusive design
- ensure that provision of assistance to access digital public services is built in to service design from the start to avoid exclusion from services
- work with Ofcom and the UK Government to help consumers improve digital skills which can boost consumer confidence in using online services

Recommendation 11: We recommend that the UK Government and Ofcom:

- continue to work with providers to ensure prominent placement of social tariff offers in a range of communication tools including ECNs, websites and apps
- monitor take up of social tariffs consider whether their makeup and the allowances included reflect what consumers need to undertake work, engage socially and access public services. It should also consider what further measures can be taken to raise consumer awareness of social tariffs. It should also consider what measures can be taken to make the process of moving to a social tariff easier for consumers, whether by automating processes, increasing channels for enquiries, or otherwise supporting consumers to navigate processes.
- take action to zero rate essential public services websites so that consumers can access these without the need for data

Recommendation 12: The Scottish Government should:

- work with providers, local authorities, third sector partners and the UK Government to boost affordable access to devices and access to affordable (and where necessary free) data
- ensure that affordability and access issues are addressed as part of its digital action plan and strategy