

Focus on...

Digital switchover: Memorandum for the House of Lords Select Committee on communications

By Alison Hopkins, Principal policy advocate, Consumer Focus

This memorandum responds to a request from the Clerk of the House of Lords Select Committee on Communications for a written submission in connection with its inquiry into the progress of, and prospects for, digital switchover of both television and radio in the United Kingdom. We would be happy to discuss these issues further with the Committee.

About Consumer Focus

Consumer Focus is a statutory body that champions the needs of consumers across England, Wales, and Scotland and, for postal services, Northern Ireland. We operate across the whole of the economy, persuading businesses and public services to put consumers at the heart of what they do. Consumer Focus has the power to take action where markets are failing consumers and to ensure a fair deal for all – especially the vulnerable and disadvantaged. As well as highlighting problems for consumers, we work with a range of organisations to champion creative solutions that improve consumers' lives.

1 Consumer Focus work on Digital switchover

- 1.1 We work with Government, Digital UK and other major stakeholders in digital television through our membership of the Digital Consumer Expert Group (CEG). The CEG was established in 2005 by the then Broadcasting Minister, Lord McIntosh, to advise Ministers on the consumer dimension of switchover, and we refer to the work of the Group in this submission. Through this Group we have worked on issues of concern to consumers, including the need for a Help Scheme which the CEG was instrumental in establishing, developing the digital tick logo to help consumers to identify digital-ready products and improving product labelling using an easy to use score-card format that lists the key features of digital products.
- 1.2 The Group also submitted a report to Ministers on consumer issues in the context of switching to digital radio, which is highly relevant to the inquiry¹.

¹ See appendix

- 1.3 In addition, our colleagues in Consumer Focus Scotland ran a Digital Diaries² project during the switchover period for the Scottish Borders area in 2008. This gathered important evidence about consumers' experiences of switching which Consumer Focus Scotland will submit to the Committee separately.

Their conclusions were that vulnerable consumers were not well informed or prepared early enough in the process, partly because the Digital Switchover Help Scheme was not fully communicated. Retailers were not consistently well prepared for switchover, leaving consumers without good information and advice at point of sale. Consumers wanted access to effective local support and a trusted independent source of information and advice.

Our colleagues in Consumer Focus Wales researched some of the challenges consumers face in obtaining accurate and reliable information about whether switchover requires any changes to their TV aerials, which we refer to in our submission.

2 Summary

- 2.1 The Committee inquiry is making a brief interim assessment of the switchover programme for analogue to digital television and the prospects for switchover for radio.

Our submission focuses on five issues:

- The hidden complexity of digital TV creates more confusion than anticipated
- Consumers need better access to independent, personalised information and advice so that they (especially vulnerable people) feel better informed and prepared well in advance of switchover, and have support before, during and after the switchover date
- Effective and well resourced local help and advocacy schemes need to be widely available
- Consumer protection networks need to anticipate the potential for, and help consumers guard against, rogue traders and mis-selling
- The case for switching to digital radio has not been made, from the consumer perspective

3 Hidden complexity

- 3.1 Many consumers have switched from analogue to digital TV without any major difficulties, as reported in Digital UK's (DUK) regular bulletins. However, as we have argued since the early days of the Digital Action Plan, through our predecessor body the National Consumer Council, switchover is not a straightforward experience and considerable numbers of consumers struggle to understand what switching means in practical terms. The Digital Diaries project showed that there is a big difference between:

- consumers knowing that switchover is happening and knowing what to do
 - finding out what is the best option for their needs and how to install it successfully
- and then dealing with post-switch technical hitches or ongoing changes such as retuning.

² Digital Diaries – digital TV switchover: consumers' experiences, Scottish Consumer Council June 2008

3.2 Although manufacturers are aware of the need to make their equipment easy to use there is an in-built tension between ‘usability’ and the drive for more sophisticated functionality of digital devices. The CEG has, with the Department for Business, Innovation & Skills, been in discussions about how consumer-defined usability requirements could be built into manufacturing but commercial imperatives mean that manufacturers tend to place more emphasis on technical add-ons and increased complexity to attract buyers rather than producing basic models that put ease of use first.

4 Access to independent, personalised information and advice

4.1 Most of the readily available information about the options for switching is:

- online, which makes it inaccessible for those without internet access or who find it difficult to read online
- at point of sale which is often too late to help people make a fully informed decision

There is no single authoritative source of information and advice for consumers as responsibility for communications and dealing with problems is fragmented. DUK, broadcasters, manufacturers and the Help Scheme all produce helpful guides but the amount of information is confusing, and consumers find it difficult to establish its independence.

4.2 The Digital Tick logo scheme goes some way to trying to deal with this but on the whole consumers would prefer to have a single point of information that they know is independent of ‘the digital industry’, and where they can find out what is the best option for their needs. The Digital Diaries project found low levels of awareness of the significance of the logo among consumers in Scotland.

4.3 The Ricability website (www.ricability.org.uk/) provides useful comparative details about the various products on the market, and a guide to working out what best meets individuals’ but even if consumers are aware of this information resource, the same comments about online access apply.

5 Practical help and advocacy

5.1 Even though Digital TV equipment is arguably less complicated than computers, the terminology and techniques such as the use of menus and prompts are unfamiliar to many individuals who have no other natural contact with digital equipment through employment or education. This makes it very difficult for people to navigate instructions or to make adjustments to their equipment. People in this group may feel they will be able to cope, and initially set up their equipment successfully – possibly with help from family and friends or through the Help Scheme. But the ongoing complexity means they do not know what to do on a day to day basis or when something unexpected happens.

5.2 Many consumers have been confused by having more than one switchover date, the need to retune their equipment through the different stages of switchover, unexpected changes in the number of channels they can access, or have had difficulty in using the menus, electronic programme guides and recording devices. The ongoing introduction of new equipment and options such as high definition TV (HDTV) adds to the complexity and confusion.

- 5.3 There is no easy way to identify these individuals in advance, and they may not realise themselves until switchover is well under way. The Help Scheme was not designed to provide help with post-installation problems, leaving a potential gap in support.
- 5.4 Consumer Focus supports the Digital Switchover Help Scheme (DSHS), though we would welcome its extension to include more people who have difficulties in coping with digital switchover, rather than the existing age and disability grounds for eligibility, as well as a wider scope to include a wider range of support.
- 5.5 Based on their experience of roll-out, the Help Scheme operators have also identified some need for improvement in the way it works. This includes the timing and distribution of publicity material and reminders, and the continuing need to simplify the information pack outlining what is on offer. The pack contains a lot of detail which can feel daunting, with a risk that some potential beneficiaries just discard the information. Some consumers think the mailings are junk mail and dispose of the material without realising they could benefit, and others (especially those who have to pay a contribution) don't realise how much support they would receive so assume it is not good value for money.
- 5.6 As people don't always know what they're going to need before switching happens they think they won't need the Help Scheme but run into trouble later on in the process but cannot recall how to get in touch, or think it's too late to do anything about it.
- 5.7 The Help Scheme concentrates on obtaining and installing equipment but does not extend to the ongoing day to day problems that might arise but aren't anticipated by Help Scheme users eg retuning, integrating other recording equipment, resetting timers. These issues present a particular challenge to deaf or blind people (many of whom have age-related conditions and may not be registered as disabled) who have more complicated access needs.
- 5.8 Digital Outreach Limited is a partnership that brings together Age Concern England, Help the Aged, Community Service Volunteers and Collective Enterprises Limited to develop support services locally. They train volunteers, provide information to potentially vulnerable people and organise public meetings, home visits and switchover help centres. To some extent Digital Outreach plugs the gap between the Help Scheme and more general needs in local communities but there is some evidence that the model is not working as well as it should. The Digital Diaries project and individual anecdotes indicate that vulnerable people are not always referred, and that public awareness is patchy. Work is in hand to improve the links between the Help Scheme and Outreach services but we will continue to monitor its effectiveness.

6 Consumer protection

- 6.1 At the instigation of the Consumer Expert Group, DUK has been working closely with trading standards professionals, Consumer Direct, Citizens Advice and others to identify and reduce the opportunities for rogue traders, opportunistic burglary, and mis-selling of new equipment when it isn't necessary, for example new aerials. Consumer Direct has not identified any significant increase in incidents connected with digital switchover to date but is continuing to monitor the situation.

6.2 Evidence from the research conducted in Wales revealed the potential for problems resulting from low levels of understanding among consumers and aerial installers about whether they would need to replace their existing aerials. Consumers may have paid for new aerials and other equipment when they did not need to. In the Consumer Focus Wales mystery shopping exercise:

- around a quarter of installers said the caller would need a new aerial, which seems high in relation to the Ofcom estimate that only around 10 per cent of households would need replacements
- installers in some areas did not know the date of switchover (92 per cent in the Swansea area knew but only around 57 per cent in the Newport area)
- 44 per cent of installers didn't explain it was easy to check the signal strength using teletext or by plugging in a digibox. Instead they said they would need to visit the consumer's home, or that it was not possible to check³

7 Digital radio switchover

7.1 Consumer Focus is not convinced of the consumer benefits of switching to digital radio. We support the conclusions of the 2008 report from the Consumer Impact Group⁴ to the Digital Radio Working Group; set up to advise Government on the feasibility of switching to digital radio.

7.2 The report argued that neither the market nor consumers are prepared for switching, especially if it were to happen soon after the digital TV switch. It also questioned both the benefits and the desirability of changing. It suggested that further research should be conducted to find out more about the pattern of ownership and usage of analogue and digital radio, especially among consumers who may bear the greatest impact, eg:

- people with disabilities
- those whose first language is not English
- people aged 65 and over
- those in low incomes

7.3 In the event of a digital radio switch, we would advise learning from the television switchover programme by setting up similar (and more effective) programmes and organisations to support consumers, including:

- a help scheme with broad eligibility criteria (including help with costs) and an outreach support system
- high profile national and regional information campaigns
- product labelling based on the digital logo or kite mark
- manufacture and promotion of easy to use, 'accessible' products.

³ www.dso-wales.consumerfocuslabs.org

⁴ See appendix

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Consumer Focus

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