



**Consumer
Focus**
Campaigning for a fair deal

Consumer Focus response to the European Commission's consultation on 'Post-i2010: priorities for new strategy for European information society (2010-2015)'

October 2009

About Consumer Focus

Consumer Focus is the statutory organisation that champions the interests of consumers across England, Wales, Scotland, and for post, Northern Ireland.

We were formed through the merger of three organisations – energywatch, Postwatch and the National Consumer Council (including the Scottish and Welsh Consumer Councils).

Through campaigning, advocacy and research, we are the voice of the consumer in private and public sectors by working to secure fairer markets, greater value for money, and improved customer service.

Consumer Focus and digital policy

Although Consumer Focus is a new body, it has a significant track record of engagement with digital policy issues through our predecessor organisation the National Consumer Council (NCC). This includes work on privacy and data protection¹, online advertising directed at children² and intellectual property rights (IPRs)³.

Consumer Focus has identified digital issues as a priority and we are building on the NCC's experience in the areas of privacy, online advertising⁴ and IPRs⁵, as well as developing new working areas such as mobiles, digital inclusion and e-commerce.

We have engaged in the Digital Britain process, a major initiative of the UK Government, which primarily seeks to position the UK as a long-term leader in communications, creating an industrial framework that will fully harness Digital Technology⁶. We also responded to the UK Government consultations on Digital Inclusion Action Plan, 'The Future: developing a copyright agenda for the 21st Century' and the Power of Information Taskforce Report.

In addition, Consumer Focus continues advocacy and policy engagement at European and international level, and is part of the BEUC's expert's digital team and co-chairing TACD Intellectual Property Working Group⁷.

¹ Data Sharing and data protection – National Consumer Council's response to the Data Sharing Review, February 2008; Susanne Lace (ed.), *The Glass Consumer: Life in a surveillance society*, National Consumer Council, 2005.

² Fair Game. Assessing commercial activity on children's favourites websites and online environments, National Consumer Council 2007.

³ The Power of Information: An independent review by Ed Mayo and Tom Steinberg, National Consumer Council 2007; Gowers review of intellectual property, National Consumer Council submission 2006; The user innovation revolution: how business can unlock the value of customers' ideas, National Consumer Council 2006; National Consumer Council submission to The All Party Internet Group inquiry into Digital Rights Management, 2006; Review of EC legal framework for copyright, National Consumer Council 2004.

⁴ Consumer Focus response to the consultation on the proposed CAPS and BCAPS Code, June 2009.

⁵ Consumer Focus response to consultation on legislation to address illicit peer to peer (p2p) file, September 2009; Consumer Focus response to Intellectual Property Office Copyright Tribunal consultation, July 2009; Consumer Focus submission to the Conservative Review of Creative Industry, May 2009; Copyright in digital age – What role for a Digital Rights Agency, Consumer Focus discussion paper, March 2009; Intellectual Property Office: the Future: developing a copyright agenda for 21st century, Consumer Focus, February 2009

⁶ Digital Britain, Final Report, June 2009, Department Culture Media and Sport and Business Innovation and Skills.

⁷ <http://www.tacd-ip.org/blog/>

Introduction and summary

Consumer Focus welcomes the opportunity to contribute to the Commission's consultation 'Post-i2010: priorities for new strategy for European information society (2010-2015)' (Post-i2010 strategy) on policy development in this key area for consumers. We recognise the impact of Information Communication Technologies (ICT) on the European market and consumers and support the Commission's Post-i2010 strategy initiative to set up a new digital agenda for Europe that meets emerging challenges and opportunities.

Consumer Focus wants to see a digital economy characterised by competitive, dynamic and innovative markets to which consumers have meaningful access and they are empowered to make informed choices⁸. There needs to be a fair balance between consumer and intellectual property rights holders, and consumers need to be given a secure digital environment and effective control of their data.⁹In order to achieve these overall objectives, consumers need to be placed at the heart of the Post-i2010 strategy with consumers digital rights endorsed and embedded in the EU digital policy and regulatory frameworks.

Consumer Focus, through its predecessor organisation NCC, working together with consumer organisations from the European Consumers Organisation (BEUC) and Trans Atlantic Consumer Dialogue (TACD), has helped to establish essential consumers 'digital rights'¹⁰:

1. Right to access neutral networks
2. Right to access digital media and information
3. Right to access secure networks and services
4. Right to privacy and data protection
5. Right to software and interoperability
6. Right to barrier free access and equality
7. Right to pluralistic media

Consumer Focus is fully committed to these digital rights and we asked the UK Government to include them in the development of the UK digital strategy 'Digital Britain'¹¹.

⁸ Consumer Focus response to Digital Britain Interim Report, March 2009.

⁹ Consumer Focus Work Programme to March 2010.

¹⁰ Trans Atlantic Consumer Dialogue 'Charter of Consumer Rights in the Digital World', March 2008.

¹¹ Consumer Focus response to Digital Britain Interim Report, March 2008.

We also call upon the Commission to build these basic consumers digital rights into the Post-i2010 strategy and address challenges in consumer protection in the digital market with the aim to achieve:

- An effective regulatory framework for protection of consumers digital rights which grants consumer protection for digital products, protects consumers against misleading and unfair online advertising, strengthen consumers rights in mobile commerce, online trading platforms, online dispute resolution and redress, and provides enhanced protection for vulnerable consumers
- A secure digital environment with protection of personal data and privacy that ensures the consumer's right to informed consent
- Non-discriminatory access to online goods and services across the EU which promotes social inclusion and eliminates legal, economic and social barriers
- A low carbon energy economy that promotes and facilitates sustainable consumption

An effective regulatory framework for online consumer protection

Over recent years the unprecedented growth of ICT has transformed the European marketplace and impacted on consumption patterns, and cultural and social behaviour. Emerging new forms of virtual trading such as e-commerce, mobile commerce, online auctions, social networking, social shopping, online banking and health services offer tangible benefits to consumers. However the new online environment also poses challenges to consumer protection.

The existing regulatory framework developed in the pre-ICT era is ill adapted to the needs of rapidly evolving digital environment with increasing demand for digital content of downloads, subscriptions and streaming. The currently applied legal instruments to safeguard basic consumer's rights to safety, information, choice, dispute resolution and redress are either weak or not applicable to the digital market place.

The newly proposed legislative frameworks to improve consumer protection at the EU level such as the Consumer Rights Directive,¹² neglects the area of digital goods and services and growing consumers' reliance on digital technologies¹³.

The lack of adequate consumer protection exposes consumers to unacceptable risks and contributes to low consumer confidence in the online environment exacerbated by concerns over product information, advertising, the protection of privacy, issues of trust, cancellation rights, lack of clarity over end of users licence agreements, dispute resolution and redress, and lack of effective enforcement at a distance.¹⁴

Consumer Focus is glad to see that the Commission reflected upon many of consumer concerns in the Post-i2010 strategy questionnaire. We recommend that the Commission addresses consumer concerns fully in the Post-i2010 strategy and expand on the issues in relation to applicability and enforcement of the current EU consumer protection online frameworks as below.

Digital products

Consumers' rights and obligations in relation to the purchase and servicing of digital products are not clearly established and the law has not kept pace with technology. For example there is no right to redress or remedies for faulty or damaged digital goods and services. Consumer Focus recommends assessing consumer protection gaps with regard to digital products.

There is also an unfair balance between protection of the end of user's rights and protection of copyright holders. Intellectual Property Rights (IPRs) allow technological (Digital Rights Management) and territorial restrictions placed on products to protect copyrights holders. Whereas consumers are granted limited rights which result in

¹² Commission of the European Communities, Proposal of a Directive of the European Parliament and of the Council on consumer rights, 8 October 2008.

¹³ Consumer Focus response to the Committee on Internal Market and Consumer Protection on the Consumer Rights Directive, 2009.

¹⁴ Commission of the European Communities, Commission Staff Working Document, Report on cross-border commerce in the EU, 5 March 2009.

uncertainties over legal use of the digital content they buy and interoperability of equipment used.

Consumer Focus recommends the examination of both (1) applicability of End User Licensing Agreements (EULA) under the Unfair Contract Terms regulations including third party agreements, and (2) transparency of terms and conditions in contracts with provisions for Digital Rights Management (DMRs) software, with a focus on interoperability clauses and the protection of consumer's confidentiality.

Online advertising

Technological ability to collect personal data on a large scale and detect information about individual consumer behaviour is changing the face of advertising and giving rise to profiling and targeted advertising. In parallel new sophisticated marketing and advertising techniques are employed where the line between editorial content, interactive advertising and direct selling is blurred. Children are particularly susceptible to the new type of online advertising¹⁵. In addition the issue is complicated by the ability of online advertising to reach consumers trans-border where different regulations and standards may apply.

Self-regulation and best practice guidelines for online advertising do exist but are not standard between nations, often confusing and misleading in their interpretation, weak in enforcement and remedy mechanisms, and coverage across industry. For example in the UK the recently adopted Good Practice Principles on Behavioural Advertising developed by the Internet Advertising Bureau UK (IABUK) was only endorsed by 10 out of 500 members¹⁶.

We highlighted some of the concerns in response to the consultation on the proposed revisions of the British Code of Advertising, Sales Promotion and Direct Marketing (CAP) and the Broadcast Committee of Advertising Practice Code (BCAP) such as (1) the lack of clarity in the application of the Codes to advertisements in space that is not paid for, (2) the issue of non-UK-registered websites which target the UK consumers, and cross-border cooperation and enforcement, (3) the need for pro-active action to monitor internet advertising practices and enforce codes and regulations especially with regard to children¹⁷.

All these factors raise questions whether the currently applied regulatory framework within the EU sufficiently copes with the change and ensures consumer protection against misleading and unfair advertising and marketing practices.

We recommend the Post-i2010 strategy examines consumer protection in relation to online advertising.

¹⁵ TACD Resolution on Marketing to Children Online, August 2009; TACD Resolution on Children and E-Commerce, July 2002; TACD Resolution on Children and Electronic Commerce, April 1999; Fair Game. Assessing commercial activity on children's favourite websites and online environments, National Consumer Council 2007; Interactive Food & Beverage Marketing: Targeting Children and Youth in the Digital Age, K.Montgomery and J.Chester, 2007; How young children interact with online environments. An ethnographic study for consumer reports WebWatch by W.Buckleinter, 2008.

¹⁶ <http://www.youronlinechoices.co.uk/good-practice-principles>

¹⁷ Consumer Focus response to consultation on the proposed CAPS and BCAPS Code, June 2009.

Mobile commerce

With the convergence of operating platforms and the increasing number of mobile phone users' mobile commerce is expanding rapidly in many countries, attracting especially young consumers¹⁸.

The most popular list of goods and services traded over mobile phones include ring tones, screen savers, games, traffic reports and news¹⁹. However, the new type of trading raises concerns over limited information disclosure, payment security (unauthorised purchase), privacy, child protection and malware (spam and viruses), as highlighted by the OECD Policy Guidance for Addressing Emerging Consumer Protection and Empowerment Issues in Mobile Commerce²⁰.

The TACD exploratory survey on mobile commerce conducted in 2006 reported 38 per cent of survey respondents experiencing problems with mobile commerce; more than 59 per cent of those never complained to anyone to resolve the problem, and 50 per cent of those who complained did not resolve the problem successfully²¹.

Consumer Focus recommends the Post-i2010 strategy examines consumer protection gaps in relation to mobile commerce.

Online trading platforms

Online auctions are another new form of e-trading where there are loopholes in the regulatory framework that compromise consumer's rights.

Online auctions, in general, are regulated by consumer to consumer transactions (C2C). Thus in cases of businesses using online auctions for trading 'fixed priced' products business to consumer (B2C) regulations should apply. However, business sellers' information requirements are not always available to consumers. And consumers are often not aware whether they are dealing with a seller selling 'in the course of a business'.²²

In addition limited liability of online auctions hosts leaves consumers vulnerable to potential loss. The EU Member States distance selling regulations do not apply to distance contracts 'concluded at an auction'²³.

Consumer Focus recommends the Commission to examine enforcement of consumer protection regulations in relation to online trading platforms.

Dispute resolution and redress

Mechanisms put in place to safeguard consumers' right to dispute resolution and redress are complicated by factors such as different models of jurisdiction and Alternative Dispute

¹⁸ According to Juniper Research by 2009 mobile commerce will generate revenues of up to 88 billion USD in: TACD Resolution on mobile commerce, August 2005; please also see the OECD Digital broadband content, OECD 2005.

¹⁹ EP IMCO Briefing Note on Consumer Confidence in the Digital Environment, 2006.

²⁰ OECD Policy Guidance for Addressing Emerging Consumer Protection and Empowerment Issues in Mobile Commerce, Korea 2008.

²¹ TACD Mobile Commerce Survey, July 2006; see also TACD Resolution on Mobile Commerce, 2005.

²² Internet Shopping. An OFT Study, 2007

²³ Internet Shopping. An OFT Study, 2007.

Resolution (ADR) trans border, weak enforcement, high costs, poor accessibility and convenience²⁴. Although the Commission has initiated actions to improve redress across EU borders further work is required to strengthen redress mechanisms, especially collective redress.

We recommend the Post-i2010 strategy builds upon the work on collective redress which has already been initiated by the Commission²⁵.

²⁴ TACD Resolution on Alternative Dispute Resolution in the Context of Electronic Commerce, January 2000.

²⁵ European Commission Green Paper on Consumer Collective Redress, Brussels, 22 November 2008.

A secure digital environment with protection of personal data and privacy

In the era of mass digitalisation protection and security of personal data is increasingly critical. New technologies applied in the online environment facilitate collection, storage and trading of personal information during the process of internet search, shopping, networking, socialising, entertainment or accessing essential services such as banking, health and public utilities billing. This process is carried out en masse on an unprecedented scale, in comparison to the off-line world, 'with' or 'without' consumers consent.

The technological ability to collect and process data has led to commoditisation of personal information used to supply the new online marketing model known as profiling, targeted or behavioural advertising. As the NCC Glass Consumer explains, 'in the private sector, personal information underpins attempts to increase sales... by customising and personalising goods and services'²⁶. The development of 'cloud computing' presents further risks for personal data online, and plans are under way to utilise this technology for public IT systems and storage of public data such as health records and others without proper risk assessments with regard to privacy and security²⁷.

Consumers are encouraged to store and trade personal data in exchange for 'free products' and many online services are provisional to giving away personal information such as social networking sites.

Consumer Focus believes that the regulatory frameworks on data protection, privacy and online security are not keeping abreast of ICT developments and market changes. Generally, privacy protection on the internet is poor, and incidences of fraud are high. The black market and white market for personal information is growing, with information having significant value for fraudsters and advertisers alike. And with an increase in handling and storing of information, particularly electronically, the risks are very much alive. The latest Symantec report for the UK indicates that 'Hackers can access personal emails and the sensitive information often stored in them, including passwords and codes, through Internet Service Providers. Email accounts are the third most-sold item on the online black market'²⁸.

This leaves consumers increasingly concerned over safety of personal information collected online and the potential for abuse, and undermines consumers' trust online. According to the OFT Internet Shopping study consumers are put off line by the fears

²⁶ Susanne Lace (ed.), *The Glass Consumer: Life in a surveillance society*, National Consumer Council, 2005, p3.

²⁷ Digital Britain, Final Report, June 2009, p. 213.

²⁸ Symantec, Symantec Global Internet Security Threat Report, Trends for 2008, Volume XIV, April 2009; http://eval.symantec.com/mktginfo/enterprise/white_papers/b-whitepaper_internet_security_threat_report_xiv_04-2009.en-us.pdf

over security and privacy²⁹. Similar concerns are revealed by wider EU studies on consumers' confidence online³⁰.

Consumer Focus welcomes that the Commission acknowledges the importance of privacy and security of personal data in the Post-i2010 strategy questionnaire (Paragraphs 2, 3, 4 5 and 8) and we hope that Post-i2010 strategy will act as a catalyst to improve consumer protection in this area.

In particular we recommend that the Commission addresses data protection and security issues in relation to:

- **The regulatory framework**
- **Consumer awareness**
- **The development of sustainable business models for building in privacy**

The regulatory framework

There are many indications that the current regulatory regimes on data protection and security are not fit for purpose both in terms of powers and enforcement.

In the UK the Digital Britain report acknowledged that our frameworks for online protection have not kept pace with 200 years' development of consumer protection law and enforcement in the offline world.³¹ There has been criticism that some countries, notably the UK, have failed to fully implement the current EU Data Protection Directive³². The enforcement body in the UK, the Information Commissioner's Office (ICO), is under-resourced both in powers and resources. The Commissioner's office appears to have fewer powers to investigate and enforce the law than its counterparts in other EU countries, although it does now have the power to audit government departments³³. Less than full implementation and lack of enforcement powers have allowed many of the data breaches that have undermined public trust.

It is currently very difficult for consumers to identify and correct errors, which often only become apparent when something has gone seriously wrong. Further, there is little that consumers can do if their data is disclosed deliberately, hacked into or lost through negligence.

The regulatory framework also neglects the area of liability for third party data loss and negligence, and does not take into account remedies for security breaches that impact on a large number of individuals such as collective systems of redress.

We recommend the Commission improves the regulatory framework on data protection and privacy that protects consumers against online market malpractices.

²⁹ Findings from consumer surveys on Internet Shopping. A comparison of pre and post study consumer research, OFT 2009; Internet shopping, OFT 2007.

³⁰ Commission of the European Communities, Commission Staff Working Document, Report on cross-border commerce in the EU, 5 March 2009.

³¹ Digital Britain, Final Report, June 2009, p189.

³² Europe Claims UK botched one-third of Data Protection Directive, Out-law News, 17 September 2007. Available at www.outlaw.com

³³ Data Sharing and data protection – National Consumer Council's response to the Data Sharing Review, February 2008, p4.

Consumer awareness

In order to take advantage of ICT developments consumers need to understand the technology and risks involved. Consumers need to be equipped with tools to exercise the right to consent in practice. This means they must know who they are contracting with, what information is being stored or passed on, who else has access to information, and what security measures/risks are involved, and remedies available for potential breaches. Consumer Focus believes that more transparency in communication from business is required to inform consumers about their commercial practices. We also recommend that more public resources are allocated to inform and educate consumers about their privacy rights and the risks involved, and provide advice and technical assistance on how to apply the protection in practice.

Special emphasis should be placed on vulnerable consumers such as children and minors who are particularly at danger of abuse and expose to market malpractice³⁴.

The development of sustainable business models

Consumer Focus recommends that the Post-i2010 strategy promotes investment in ICT research and innovation in the area of privacy and security, and encourages the development of business models based on the use of Privacy Enhancing Technologies (PETs) and privacy by design technology. Regulations and standards set by the Commission should force businesses to comply with the highest data protection and security standards and consumer best practice, and sanction data protection offenders.

³⁴TACD Resolution on Marketing to Children Online, August 2009; TACD Resolution on Children and E-Commerce, July 2002; TACD Resolution on Children and Electronic Commerce, April 1999.

Non-discriminatory access to online goods and services across the EU

Consumer Focus supports the principle of net neutrality which prioritises for consumer choice to access, use and provide content, services or applications, to attach devices and to be free from discrimination according to source, destination, content and type of application.

At the UK level Consumer Focus seeks Government's commitment to the principle of net neutrality, which has already been adopted in relation to online public services delivery, and we seek similar commitment from the Commission in relation to the Post-i2010 strategy.

In line with the principle of net neutrality we call on the Commission to address the problem of legal and economic barriers which distort the online EU market and result in limitation of access and choice, price discrimination and reduced competition³⁵.

We are particularly dismayed by the existence of territorial licensing for online content within the EU which goes against the principle of the open internal market, restricts access to goods, services, knowledge and culture, and facilitate geographical and price discrimination, as for example the iTunes case illustrates³⁶. We call upon the Commission to facilitate development of multi-territory licensing of online content in the EU as part of the Post-i2010 agenda³⁷.

We are also concerned by the Commission's proposal of allowing 'bricks and mortar' requirements for online retailers in the recent review of the Vertical Restraints Block Exemption Regulations and Guidelines³⁸. Such a move would significantly undermine the growth of internet shopping and adversely affect efficiency, consumer choice and competition in the single market. We recommend the Commission to remove 'brick and mortar' restrictions to be placed on distribution chains online from the exemption under the Vertical Restraints Block Exemption Regulations and Guidelines.

We also call upon the Commission to address the issue of additional discriminatory barriers, in accessing digital technology, in the context of European commitment to halve the gaps in digital literacy and competence by 2010³⁹ as well as potential review of the Universal Service Obligations in broadband.⁴⁰

³⁵ Refusal to serve consumers because of their nationality or residence – distortions in the Internal Market for e-commerce transactions, European Parliament's Committee on Internal Market and Consumer Protection, 2007.

³⁶ <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/22>

³⁷ Multi-territory licensing of music online, DG Competition's Online Commerce Round Table, BEUC statement, ref:x/048/2009-03/07/09.

³⁸ Consumer Focus response to the Commission's Vertical Restraints Block Exemption Regulations and Guidelines, September 2009.

³⁹ Ministerial Declaration of Ministers of European Union Member States, 11 June 2006, Riga, Latvia.

⁴⁰ Consumer Focus response to Digital Britain Interim Report, March 2009.

According to Ofcom's research currently only 20 per cent of the UK population can be described as engaged with digital television, internet and mobile phones⁴¹ despite 57 per cent of the UK adults having access to the internet⁴². Therefore we would recommend that the Post-i2010 strategy does not simply concentrate on the physical connectivity, but also addresses issues such as competence in using computers and their applications, being able to afford equipment, understanding the conditions attached to digital products, overcoming fears and barriers, and knowing how to resolve problems if they arise⁴³.

We support the Commission's proposal of making public services available and accessible to all online (Paragraph 8) with regard to eGovernment and eLearning initiatives. However we urge the Commission to avoid creation of new digital divides. With governments increasingly looking to digital means of delivering public services, care must be taken so that those who are not connected to the internet, or who are not regular or experienced users do not miss out. Consumer Focus recommends strengthening multi-channel delivery options, in particular via mobile phones as these have a much wider penetration among disadvantaged communities than the internet⁴⁴. It is also critical to keep other channels such as telephone lines, face to face opportunities or written correspondence open in order to maintain access for everyone.

This is particularly important as many digital services remain difficult to find and use. Consumer Focus would also advocate strengthening the accessibility and usability of digital services by making sure the consumer is at centre of their design, which we feel currently limits the potential value of digital services. We feel that for too long, digital public services have been determined by what has been available and easy for providers to supply, as opposed to being based on consumer priorities⁴⁵.

Our research indicates that the following measures are required to enable access to public services online:

- A genuinely consumer-centred approach to drive reform, an urgent rethink of the government's existing approach to online public services is required
- Reduce the volume of information, only including it on the basis of consumers' expectations and does not try to replicate other trusted sources
- Allow for services to be personalised around consumers, based on their preferences and location
- Improve search and navigation facilities based on an understanding of the way that people actually use the web
- Let content be informed by what consumers would expect to see from a government site, and what they would most value
- Make the whole digital service offer much more responsive and open to consumers to add value
- Make sure any changes are moving in the same direction as developments in new practice and usage of the internet and digital technology⁴⁶

⁴¹ Ofcom, Media Literacy Audit, Report on UK Adult's Media Literacy, May 2008.

⁴² <http://www.ofcom.org.uk/research/telecoms/reports/onlineprotection/summary/>

⁴³ The Digital Divide. Universal Service and Broadband, Consumer Focus 2009; Digital Britain, Final Report, June 2009.

⁴⁴ Annual Planning for Consumer Change Survey, the Futures Company, 2009.

⁴⁵ Does Directgov Deliver? Consumer Focus, September 2009.

⁴⁶ Does Directgov Deliver? Consumer Focus, September 2009.

It is also important to strengthen security and privacy mechanisms so that people feel able to share sensitive personal information safely.

In the case of eHealth initiatives which propose sharing of electronic medical records of patients between health services independent risk assessment analysis on data protection and privacy should be carried out.

Sustainable consumption

Consumer Focus welcomes the Commission's Post-i2010 strategy questionnaire recognises the role ICT can play in contributing to a sustainable 'low carbon' economy.

However in order to encourage positive changes in consumption patterns and minimise negative effects at all levels appropriate policies need to be developed which take into account consumers' interests.

For example smart metering technology could offer benefits for both consumers and for the environment by helping consumers to better manage their fuel and contribute to a reduction of fuel consumption. However, this technology also brings many concerns for consumers such as financial risk, lock-in to the technology due to a lack of compatibility and poor interoperability, potential abuse of mis-selling, misuse of remote switching, and risk to consumers' privacy and security amongst many. Those concerns need to be address properly otherwise attempts to encourage consumers to engage with smart metering and save energy will fail⁴⁷.

Consumer Focus also recommends that ICT could play a particularly strong role in reducing the need to travel. In the UK alone transport accounts for 22 per cent of UK greenhouse gases, and ICT can help reduce the need for travel, help people with their travel planning (both online and at the street level), and improve links between different parts of the public transport system. This requires good online access and the rollout of broadband to all parts of the country, with particular potential for cutting emissions amongst the knowledge services workforce who can more frequently work from home and cut travel use.

⁴⁷ Call for action to reduce the risks and increase the benefits of smart metering for consumers London, ECCG Subgroup on Energy - Consumer Representatives at the Citizens Energy Forum, 30 September 2009.

Consultation responses and publications 2009

October

Does Directgov deliver?

September

Consumer Focus response to Ofcom mobile sector assessment second consultation

The Business Case for Investing in Pro-active Privacy Protection

Consumer Focus response to the Commission's Vertical Restraints Block Exemption Regulations and Guidelines

August

Waiting to be heard

July

Consumer Focus response to Intellectual Property Office Copyright Tribunal consultation

June

Consumer Focus response to consultation on the proposed CAPS and BCAPS Code

Consumer Focus response to Ofcom's Quality of service customer review: second consultation

Consumer Focus response to Ofcom access and inclusion consultation

May

Consumer Focus submission to Energy Supply Probe – proposed retail market remedies consultation

Consumer Focus submission to Direct Debit arrangements - Ofgem report and consultation

Consumer Focus submission to the Conservative Review of Creative Industries

Consumer Focus response to apComms enquiry

The Digital Divide

March

Copyright in a digital age - What role for a Digital Rights Agency? (discussion paper)

Committee on Internal Market & Consumer Protection on the Consumer Rights Directive

Consumer Focus response to Interim Digital Britain report

February

Consumer Remedies

Consumer Focus's response to the Commission's consultation on 'Post- i2010: priorities for new strategy for European information society (2010-2015)'

If you have any questions or would like further information about our response please contact Marzena Lipman, Senior Policy Advocate, by telephone on 020 7799 7981 or via email: marzena.lipman@consumerfocus.org.uk

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