

CCIA Response

Consultation on the designation of Radio Selection Services

Introduction

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For more than 50 years, CCIA has promoted open markets, open systems, and open networks. Its members include the companies that are providers of all three services proposed for designation in the consultation and many others with a broad interest in stable and proportionate regulation of digital intermediaries.

AI-enabled future capabilities

Designation regulations should explicitly reference and stay within the limits of the statutory Radio Selection Services (RSS) definition. In particular, the Government should be very clear that the regulations do not unintentionally capture general purpose AI services.

Ongoing assessment

The Government should clarify its approach to designation in the future, including the revocation of a designation, given the potential for RSS to grow and contract over time, and that the case for designating any given service will move with it.

The 700,000 figure was the significance threshold Ofcom applied in Ofcom's final report to the Secretary of State at the recommendation stage under s.362BC(2)-(4) of the Communications Act 2003 (as inserted by the Media Act 2024) (the "**Act**") to decide which services to recommend for designation. An Ofcom consumer research survey (commissioned from YouGov; 4,040 UK adults aged 16+, nationally representative) was used, not RSS provider data.

The Secretary of State has the power to revoke the designation of a designated RSS under s.362BD of the Act, including following a request by the provider of a designated RSS. The Government should specifically clarify the basis on which a provider could make such a request, including whether the scope of this consultation includes a 700,000-user (or any other) threshold figure against which RSS providers can monitor their own usage on an ongoing basis to determine whether a revocation request should be made.