

Consultation response form

Please complete this form in full and return via email to nmr2017@ofcom.org.uk or by post to:

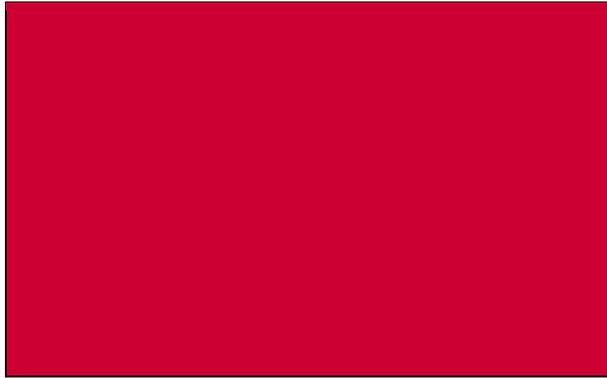
James King
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Consultation title	Further consultation: Narrowband Market Review
Full name	[X]
Contact phone number	[X]
Representing (delete as appropriate)	Self / Organisation - please provide the organisation's name below
Organisation name	Telecom2 Ltd
Email address	[X]
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes/No

Your response

Question 1: Do you agree with our proposed obligation on all telecoms providers with SMP in the WCT markets to notify Ofcom annually of the FTRs they have charged? Please provide reasons and evidence in support of your views.	<p>Confidential? – N</p> <p>We agree with the remedy but have serious concerns with the method of applying it. We have no objection to OFCOM knowing our FTRs but having to individually notify them to OFCOM and for OFCOM to collate the results is resource hungry and not efficient for Telecoms Providers and OFCOM. It would be efficient if OFCOM were to download the appropriate parts of the Carrier Price List.</p> <p>All the FTRs would be there, with some history, in a common format that would guarantee</p>
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	<p>accuracy and timeliness. Telecoms Providers, some of whom have limited resource, would be free of the need to complete returns to OFCOM. OFCOM would have no need to send out requests for information, check who had returned the information and send reminders. The common format would permit faster more efficient processing of the data within OFCOM.</p> <p>FTRs outside the CPL would be few, if any, these would need returns etc. but the level of resource needed by Telecoms Providers and OFCOM would still be significantly lower.</p>
<p>Question 2: Do you agree with the remedy we propose in relation to interconnection, so far as they may relate to IP interconnection? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – N</p> <p>We are in strong agreement with this remedy. The charge controls on BT’s transit and conveyance charges were removed in 2015 and, contrary to OFCOM’s stated expectations, the charges were subsequently subjected to significant increases and the structure of the charges was changed. This resulted in increased prices for consumers. It is highly likely that the same would happen to Interconnect Circuits if the control was removed but not only would the prices charged to consumers have to increase, it would create a significant barrier to entry into the market and to expansion of existing businesses.</p> <p>Given BT’s dominant market position the need for network access and the requirement not to unduly discriminate are self evident. Serious damage can be caused to a company’s business and reputation if they aren’t able to obtain sufficient capacity to timescales or suffer longer timescales for provision of capacity at higher rates than other Telecoms Providers in the same market.</p> <p>Publishing a reference offer and notifying changes to charges will enable Telecoms Providers to raise concerns about rates prior to their implementation and to allow for increases in rates when planning for the future.</p>



We have no strong views on accounting separation or cost accounting and are more interested in consistency of approach in this respect.

Transparency as to quality of service is important to show that quality of service isn't being degraded for any reason

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