

Callflow Response

- Question 4.1: Do you agree with our proposals for a specific access obligation, which includes an obligation on BT to make adjustments to its physical infrastructure when its network is congested?

Agree. Congested to include 'obstructed'. Obstructed to not only include ducts but also overhead obstructions to be cleared - typically tree cutting (noting also that tree cutting has the added advantage to openreach of removing a 'growing' (literally) fault liability. Provides certainty of investment level which is essential to encourage network competition. SLA and SLG specifics will need to be reasonable for the remedy to be effective.
- Question 4.2: Do you agree with our proposals on the scope of PIA: (1) To broaden usage through a mixed usage generic rule; (2) To modify the PIA condition to define geographic scope by reference to telecoms providers' local access networks.

Yes. 2. Yes but noting that exchange areas are typically meaningless to an alt-net as copper loss restriction does not apply (that typically constrain an Openreach exchange area). It is our view that a fibre exchange area can easily be the size of three copper exchange areas.
- Question 5.1: Do you agree with our proposed imposition of a no undue discrimination SMP condition on BT?

No particular view.
- Question 6.1: Do you agree with our proposed approach to the processes and systems relating to planning and surveying?

Agree. It should be possible for telecoms providers to be able to undertake surveys, using appropriately accredited surveyors, 'at will' and without any prior notification to Openreach. Notification of intention to survey adds no value to anyone, and just costs to the telecoms providers.
- Question 6.2: Do you agree with our proposed approach to the processes for build works and enabling works?

Agree. However, the proposed remedy for blocked underground lead-ins may not work too well in practice i.e. where there are multiple blocked lead-ins requiring multiple new 'demarcation' chambers. As such, the remedy for overhead is deemed to provide a better/cheaper certainty of supply and infrastructure more readily deployed to this type of network.
- Question 6.3: Do you agree with our proposed approach to processes relating to the connecting the customer stage?

Agree, but see also response to 6.2

- Question 7.1: Do you agree with our proposed form of price regulation for PIA rental and ancillary charges?

Agree. However, we believe that for fibre networks the underground rental 'single fee' of 25mm diameter cable/sub duct is far too large. Modern PON fibre networks can typically be built using a 7mm OD cable - as indeed Openreach have started to deploy. As such, the rental of space (as is the PIA/DPA product), needs to have some more granular cost lines to more accurately reflect the actual space being consumed. This will incentivise use of the smallest possible cable/infrastructure, and hence leave more space for other telecoms providers to provide even more infrastructure competition. We would recommend that the current 25mm rental space 'unit' is further subdivided to two lower units i.e. $\leq 8\text{mm}$, $\leq 16\text{mm}$ (and the current 25mm), NOTING that a $\leq 8\text{mm}$ cable occupies some seventh/eighth of the space of a 25mm cable i.e. so rental should be proportionally less (which is a significant rental reduction).

- Question 7.2: Do you agree with our proposed approach to the recovery of network adjustment costs?

Agree - incentivises network competition and 'levels the playing field' against Openreach.

- Question 7.3: Do you agree with our proposed approach to the recovery of productisation costs?

Agree- incentivises network competition and 'levels the playing field' against Openreach.