

**Title:**

Mr

**Forename:**

Simon

**Surname:**

Barry

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

████████████████████

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Additional comments:**

I support Ofcom's proposals for a significant reduction in mobile termination rates (MTRs) by 2015 at the latest.

However I strongly feel that this should be introduced this year ? there is no real reason to wait several years to do this. It is a fast moving industry and those most adversely affected by this artificial price-fix are people on average incomes. In a time of recession I believe that Ofcom has a duty to act quickly to put into effect a measure that will make an immediate and real difference to the monthly budgets of almost all Britons living on average or below incomes.

Ensuring that MTRs are set at the cost of making a call (what Ofcom refers to as ?pure LRIC? and estimates to be 0.5/minute) will deliver much greater competition, better deals and large savings for customers.

I can see no reason why MTRs should not be reduced to this level or lower next year, rather than waiting another four years to happen. Reducing MTRs slowly will only delay benefits to consumers.

Some mobile phone companies are already saying that they will launch better deals as soon as MTRs are cut below 1p ? including unlimited flat rate deals and better pay-as-you-go packages. Therefore, why delay?

**Question 3.1: Do you agree with our views on whether and when new MCPs should form separate markets? Are there any factors we have not considered which should inform this view?:**

**Question 3.2: Are there any other types of providers we should also consider?:**

**Question 3.3: Do you agree with our views on the specific call types that should be included in the market? Are there any factors we have not considered which should inform this view, resulting in call types other than those identified being either included or excluded from the market?:**

**Question 3.4: Do you agree with our view of that the geographic market for each of our proposed markets should be the area of the UK within which the MCP provides and can set a charge for mobile voice call termination services?:**

**Question 4.1: Do you agree with our view? Or are there other developments, not considered elsewhere in this consultation document, for potentially removing the underlying causes of SMP?:**

**Question 4.2: Do stakeholders have any comments on the analysis set out in this section?:**

**Question 4.3: Are there any other providers with SMP that we have not identified?:**

**Question 4.4: Do stakeholders agree with our proposed SMP assessment for the period until 2014/15?:**

**Question 5.1: Do stakeholders agree with the identified harm to consumers of excessive termination rates in the period 2011 to 2015?:**

**Question 5.2: Do stakeholders consider there to be any other forms of relevant consumer harm that we have not identified?:**

**Question 7.1: do stakeholders agree with Ofcom?s view regarding the need for transparency in MCT charges?:**

**Question 7.2: Do stakeholders agree with our preliminary view on application of a condition requiring network access to be provided on F&R terms?:**

**Question 7.3: what are your views on the need for an ex ante undue-discrimination condition for the period of the next review?:**

**Question 7.4: Do stakeholders believe that there are any circumstances or situations where the UK differs from other EU markets to the extent that would support a departure from following the EC Recommendation?:**

**Question 7.5: do you agree with Ofcom?s proposals for its preferred set of remedies for the provision of MCT services?:**

**Question 9.1: Do you agree that a four-year period for the SMP remedies is appropriate?:**

**Question 9.2: Do you agree with our proposed modelling approach, as discussed in this section, the supporting annexes and the actual model? If not, please discuss the specific proposals you disagree with.:**

**Question 9.3: What is your view of the harm caused by flip-flopping? Please provide evidence to support your response.:**

**Question 9.4: Do you agree with our preferred option for resolving the issue of flip-flopping ? i.e. charge changes restricted to the first day of each quarter and a 20% cap on individual time of day rate increases? If not, why not? Which is your preferred option and why? You may want to include discussion of the following in your response: the specifics of each option, e.g. the 20% cap in our preferred option, the effectiveness of the options in addressing the objectives, the practicalities of the options for you, any disadvantages/adverse effects of these**

**options for you, and any other information or views that you feel are relevant to preventing flip-flopping.:**

**Question 9.5: Are there other, more proportionate solutions that we should consider?:**

**Question 9.6: Is it clear which types of calls are included in, and which types are excluded from, the new charge control and in turn the compliance calculation? If not, which call types do you want clarified?:**

**Question 9.7: Is Ofcom taking the right steps to monitor compliance?:**

**Question 9.8: Are MCPs able to provide the information required to demonstrate compliance and for Ofcom to monitor compliance?:**

**Question 9.9: Do you agree with the conclusions of our distributional impact assessment?:**

Question 9.10: Do you agree with our EIA, that reducing MTRs will have no significant impact on any specific identifiable group? If you disagree with this statement we would welcome any evidence you hold sho