Comments:

If MTR charges are lowered how will the large MNOs react? Will handset subsidies be removed? What will be the impact on manufacturers, dealers and distributors of handsets? Will this make it harder for B2B sales?

Question 3.1: Do you agree with our preliminary view on market definition? Has anything changed, or is anything likely to change within the period of the next review, which would materially impact on the definition of the market(s)?:

Overall agrre with definition. Today there are distortions in the mobile market to the disadvantage of the mobile new entrants, MVNOs, and companies seeking to enter the mobile market at the retail level

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?:

The current arrangements protect and strengthen the position of the 4 larger MNOs. MTR charges may no longer be per minute in IP based networks; may have to be packet based, although customers may still be changed per minute

Question 5.1: What are likely to be the main sources of detriment to consumers of excessive termination rates in the period 2011 to 2015?:

Newer players are disadvantaged; new players have to have attractive pricing to their customers which can be wiped out by the off-net mtr rates paid to the dominant players

Question 6.1: Should our policy approach to regulating MCT change? For example, given the possible benefits, should we adopt a policy of reducing termination rates as far and fast as we reasonably can, within the boundaries of sound economic policy, and whilst recognising underlying cost differences? If our policy approach did change, what do you think are the relevant factors for us to consider in deciding on the best future policy to regulating MCT?:

Asymmetry between new entrants and established operators should be taken into account as proposed by the European Regulators Group
MVNOs do not receive any MTR revenue; competing against the MNOs who can have deals with customers that are loss leaders, with the revenue made up from MTRs or other revenue streams

Question 6.2: Are there additional options (other than the six set out in this consultation) that we should consider? If so what are they and what advantages/disadvantages do they offer?:

No

Question 6.3: Do you agree with our preliminary views set out for each of the options? If not, what are the additional factors that we should take into consideration, and why are the relevant to our analysis?:

Overall agree - however access to other mobile services need to be taken into account - eg sms

Question 6.4: Do you agree with our preliminary view of the De-regulatory option? If not, what are the additional factors that we should take into consideration, and why are the relevant to our analysis?:

Regulatory control must be maintained into the future; complete deregulation would be a disaster

Question 6.5: Do you agree with our preliminary view of the LRIC+ option? If not, what are the additional factors that we should take into consideration, and why are the relevant to our analysis?:

Overall in agreement.

Question 6.6: Do you agree with our preliminary view of the LRMC option? If not, what are the additional factors that we should take into consideration, and why are they relevant to our analysis? In addition what do you expect the costs of a move to this option to be?:

Mobile call termination rates should reduce from the current level and move toward the fixed line rates over time.
Called party pays model should be possible for customers who wish to tag mobiles with geo numbers.

Question 6.7: Do you agree with our preliminary view of the CBC option? If not, what are the additional factors that we should take into consideration, and why are they relevant to our analysis? In addition what do you expect the costs of a move to this option to be?:

Asymmetry between new entrants and established operators should be taken into account as proposed by the European Regulators Group.

Question 6.8: Do you agree with our preliminary view on mandated Reciprocity? If not, what are the additional factors that we should take into consideration, and why are they relevant to our analysis? In addition what do you expect the costs of a move to this option to be?:

Asymmetry between new entrants and established operators should be taken into account as proposed by the European Regulators Group.

Question 6.9: Do you agree with our preliminary view of the B&K option? If not, what are the additional factors that we should take into consideration, and why are they relevant to our analysis? In addition what do you expect the costs of a move to this option to be?:

MTR should be equivalent to the cost of call delivery; Bill and Keep may be a sledgehammer but it ensures that networks are run efficiently and larger players cannot manipulate the market.