



# Ofcom BCMR and LLCC Consultations

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## About Exponential-e

Founded in 2002, Exponential-e is one of the few technology enablers with a Layer 2, Virtual Private LAN Service, (VPLS) network. The business-only network is used to deliver managed services including cloud, connectivity and unified communications. As one of the UK's most innovative technology companies, Exponential-e designed the first ever VPLS network in Europe and brought to market the first wired internet traffic management application.

Its powerful 100GigE next generation infrastructure means that, once connected, customers gain access to their own private cloud of business services. Today, Exponential-e employs almost 200 staff and works with over 1200 blue chip corporate clients from industries including Media, Technology, Finance, Public Sector, Insurance, Leisure and Professional Services.

We have an extensive channel programme with over 300 channel partners including Carriers, Systems Integrators, Referral Partners and Value Added Resellers.

The company holds a number of awards including the Times Tech Track 100 in 2008, 2009 and 2010. In 2012 it was listed 67<sup>th</sup> on the Real Business Hot100 list of the UK's most profitable privately owned businesses and finalist in the UK Customer Experience Awards. The company also holds Dun & Bradstreet's coveted No.1 credit status.

[www.exponential-e.com](http://www.exponential-e.com)

# Response Overview

## BCMR

In the 2012 BCMR consultation Ofcom brought forward many new and unexpected changes to market definitions, geography and market share analysis together with a review of the significant issues that CPs face in their relationship with Openreach.

As Exponential-e continues to find itself highly dependent on Openreach's Ethernet access and backhaul products, the significance of this Market Review and subsequent LLCC is of paramount importance. However, Exponential-e considers that the time available to fully analyse and respond to these serious issues has not been adequate.

Notwithstanding the above comment, this response will attempt to offer some insight into the ramifications of Ofcom's proposals and to point out some discrepancies between the marketplace that Ofcom has described, BT's continued position of significant market power, their behaviour and the impact on Exponential-e.

Exponential-e would welcome the opportunity to clarify with Ofcom any points made in this document.

## BCMR Issues:

### 1. Market Definitions.

1.1. Exponential-e disagrees with Ofcom's decision to combine the Access and Backhaul markets. In the call for input, Exponential-e and UKCTA argued that there were in fact multiple *contextual* markets and would seek to draw Ofcom's attention to three of them:

1.1.1. Access circuits from BT Exchanges into business premises.

1.1.2. Backhaul circuits from CP equipment located in Access Locate space in BT Exchanges to CP Points of Presence elsewhere.

1.1.3. Inter-Exchange connectivity to interconnect CP equipment located in Access Locate space in BT Exchanges.

1.2. The marketplace for the above three categories of Ethernet circuits are quite different and have very different economics and prospect of any viable competition of supply. We will attempt to discuss each in detail as follows:

- Access circuits from BT Exchanges into business premises.

Exponential-e assesses that this category remains dominated by BT, with the vast majority of access circuit options only viable using Openreach infrastructure. We will cover this category more extensively as part of our discussion on WECLA elsewhere in this document.

*(In determining the relevant market share that BT holds, Exponential-e would ask Ofcom to verify that Exponential-e (and other CP) circuits provisioned through BT Wholesale and hence supplied using Openreach access products, are counted as BT market share and not the CP's market share).*

- Backhaul circuits from CP equipment located in Access Locate space in BT Exchanges to CP Points of Presence elsewhere.

Although the availability of non-BT backhaul infrastructure is becoming more prevalent in central London (not all of WECLA), it is Exponential-e's view that UK wide backhaul is still dominated by Openreach. The sheer volume of now legacy BES circuits will back up this assertion although since Openreach withdrew BES1000 and forced CPs to use EAD1000 instead, this has made data analysis much harder to track the difference between access and backhaul. It should also be noted that this form of backhaul at 10Gig and above will now be dominated by the use of Openreach's OSA and OSEA products confirming our view that, for the vast majority of the UK, BT is still the dominant supplier.

- Inter-Exchange connectivity to interconnect CP equipment located in Access Locate space in BT Exchanges.

This is a special form of Backhaul that in the past existed in the form of BES-Daisy-Chain. Since the introduction of WES-LA and now EAD-LA pricing, CP's have been drawn into BT Exchanges in order to be able to compete with BT Wholesale and the need to interconnect CP equipment located in Access Locate space has (and will continue to) grow significantly. This is subtly different to backhaul as described above as the LLU world simply needed to route traffic back onto a CP's own network to ultimately send it onto the Internet. Today's Ethernet solutions require more of a partial mesh design to route WAN traffic around the country and onwards to Cloud Datacentres. Hence, like BT Wholesale, the equipment in the exchanges and the circuits between the exchanges has become a substantial part of a CP's network.

Exponential-e asserts that, on a national basis, exchange to exchange connectivity is far from being a competitive marketplace and the use of EBD (where permitted by BT due to "Trunk" and "TAN" restrictions), EAD (because BES has been withdrawn) and now OSA and OSEA (because BES and WES10Gig have been withdrawn), is destined to dominate in the next three years.

The prospect of there being no charge control (or even obligation to supply on an EOI basis in the WECLA area) for a MISBO form of inter-exchange connection from BT is somewhat alarming. Although the single interface variant of MISBO as in BES and WES10Gig was specifically called out by Ofcom for special treatment, now that Openreach have signalled the withdrawal of WES and BES10Gig, the substitution of OSA and OSEA combined with BT potentially choosing to categorize them as MISBO multi-interface products is also of significant concern.

### 1.3. WECLA

1.3.1. Exponential-e disagrees with Ofcom's analysis that there is an active competitive market for access circuits to business premises in the area defined as WECLA. A quick check of our Section 135 data submitted revealed that Exponential-e had to use Openreach access products to reach its customers in the WECLA area around XX% of the time which is significantly out of sync with Ofcom's finding that BT's market share for AISBO had dropped to 41% as of November 2011.

1.3.2. Exponential-e suggests that the method of determining "high reach" post code sectors is flawed in that the analysis was restricted to businesses employing 250 or more staff. A quick analysis of the publicly available data

identifying the “number of staff employed” of Exponential-e’s customer database resulted in only XX% of our customers having been identified with 250 or more staff employed. Today’s low cost AISBO access circuits (which go down as low as 10Mbps) are now very affordable by even low end SMEs for business class Internet access.

CPs have been supplying AISBO orientated services to lower-end SMEs for many years and Exponential-e is extremely concerned that the 250 seat starting point for Ofcom’s geographic analysis of the proximity of business premises to fibre flexibility points has been compromised. The larger part of our addressable market has business premises located in areas that do not have an economic alternate to Openreach due to the nature of BT’s advantage of existing nodes and duct.

1.3.3. Exponential-e asserts that the 200 metre dig assumption, that also forms a significant component of the method to determine high reach post code sectors, is also flawed for the following reasons:

1.3.3.1. Exponential-e’s experience of trying to get a competitive alternate provider to Openreach for 10 or 100Mbps access circuits, rarely results in an OCP digging into a business premise without substantial ECCs that fail to cost in for a typical sale. The only time that an OCP solution including a dig from a fibre flexibility point does actually occur, is when the customer is willing to pay a substantial amount over and above the Openreach solution for reasons of diversity.

1.3.3.2. 200 metres in a straight line usually results in a substantially greater actual duct length as the direct route between fibre flexibility point and a business premise is rarely available.

1.3.3.3. Where digs do occur and OCPs are actually provisioning fibre, they are usually to support high value MISBO type services and not as a viable alternative supply to what are, in comparison, low value AISBO services.

Exponential-e observes that Ofcom’s concept where “... operators would be prepared to dig further if such products were not available as an alternative to investment in their own infrastructure”<sup>1</sup> is potentially flawed in that the significant amounts of capital required by multiple OCPs in

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<sup>1</sup> BCMR 5.111 para i)

order to even partially replicate BT's existing duct network is way beyond any reasonable expectation of being able to obtain such capital from the markets over the lifetime of this BCMR. In addition, such digs if they occurred at all would be focused on the MISBO high value service based sales and are exceedingly unlikely to provide an ROI for a single 10 or 100Mbps access circuit.

1.3.4. Table 26 shows two non BT CPs having 90% and 80% coverage of business in the WECLA area, with three other non-BT CPs documented at 47%, 44% and 31% coverage. Exponential-e cannot relate this description of the marketplace with the actual conditions of supply and demand of AISBO access circuits in the WECLA area. We asked one major CP and fibre operator in the area how often they self-provided AISBO access circuits by digging from one of their fibre flexibility points and the answer was "*maybe a couple of times at the most*".

1.3.5. Exponential-e maintains that Ofcom's statement in para 5.139 underestimates the capital costs, the availability of capital both now and into the near future combined with a sufficient ROI based on low-value AISBO circuits, that would trigger multiple OCPs to undertake mass infrastructure deployment to replace appropriately price controlled Openreach products that take advantage of the BT installed base of duct and fibre. The net result would not be a vacuum of supply, but in our view would drive market share back to BT.

1.4. Exponential-e is extremely concerned that BT has compiled its circuit data using a new methodology which has itself significantly altered BT's apparent market share. As, to our knowledge, CPs have not changed our approach to compiling the required circuit information in our Section 135 responses and this has the potential to create a significant discrepancy that could create a false impression of a shift in BT's market share both nationally and particularly in the new WECLA area. On the ground, Exponential-e has not observed such a decline in BT's dominance in AISBO access circuit supply into business premises.

Another material key indicator for CPs that appears to show BT increasing its share in the AISBO market is that of the statistics presented by Openreach at the Ethernet Service Forum. Please refer to the OTA for full numerical disclosure of the monthly split of BT LoBs versus OCP share of EAD orders. This is contrary to Ofcom's observation that BT's market share is declining and calls into question many of the BCMR principles that carry over into the LLCC.

## 2. TANS

2.1. Exponential-e has no idea what TANs are now meant achieve? In the previous BCMR the concept was relatively clear in that it seemed to be an initiative to reduce the barrier to entry for CPs such that they would only need to have infrastructure in 56 locations in the UK in order to be able to serve the entire country. This admirable concept relied on Openreach providing new products to extend an AISBO access circuit back to the CP's equipment in the corresponding TAN. After many years of debate and with constant clarification from the Ofcom team at the time, BT finally declined to offer such products on the basis of cost, making the whole TAN concept inoperable.

However, the one aspect that Openreach *did* implement was to introduce routing rules forbidding EBD circuits from crossing between TANs and not simply preventing the interlinking of an actual TAN exchange itself with a TAN exchange in another TAN area. Openreach also seemed to find a way to circumvent the backhaul pricing sub-cap by charging double the price for an EBD circuit that routed from an ASN to one of the alternate TAN exchanges in a TAN area making the TAN concept even more unachievable if that were possible.

The continuation of a TAN concept into the current BCMR is now totally baffling to CPs and will only result Openreach further restricting supply in various situations.

Exponential-e respectfully requests that Ofcom rethink the TAN situation and explains to all parties what the objectives are for this concept.

### 3. AI Trunk

3.1. Exponential-e observes that the AI trunk situation is ambiguous.

BCMR 6.138 appears to define AI Trunk as *"...aggregated connections between major network nodes (OHPs) in separate TANs"*, and goes on to say that *"... we do not consider it necessary to identify a regional trunk market including point to point circuits spanning AI TAN catchment areas"*.

The issue for CPs here is to try and understand what AI circuits Openreach are required to supply versus those that they simply decline to or that they assert that they are prevented from supplying as *"it would constitute Trunk"*?

For example, if a CP wanted to order an AISBO circuit between an ASN and an OHP in an adjacent TAN, would that be allowed? If the answer is yes, then consider the situation where Openreach *claim* that to route the fibre for that circuit, it would have to go via the OHP of the first TAN and then on to the OHP in the adjacent TAN

and hence classify it as Trunk? A CP would never know if a direct fibre was actually available bypassing the first TAN and thus avoiding the Trunk barrier?

Currently an EBD circuit connecting an ASN to an OHP in an adjacent TAN is banned by Openreach and they will claim that in order to achieve the route there will be an element of the circuit that goes OHP to OHP which again it would constitute Trunk.

Additionally, if a CP requests an EAD circuit between a business premise and their equipment located in an exchange on the other side of a TAN boundary, this now seems to be allowed in the new BCMR, although the pricing of this kind of connection is ambiguous. Note that Openreach's past behaviour when solving the requirement to offer backhaul to an alternate OHP for a TAN was to charge double the price.

However, in order to have any chance of working out what is and what isn't legal, CPs would need a definitive dataset showing which ASN belonged to which TAN, which currently does not exist.

These restrictions are unlikely to impact BT Lines of Business due to the sheer scale of the BT Wholesale Ethernet network which entirely eliminates their need to cross TAN boundaries. BT also benefits from its unregulated core network that obviates their need to purchase Openreach connectivity between OHPs, hence their propensity to restrict the options of smaller CPs by playing the "Trunk" card whenever possible.

### 3.2. Competitive National AI Trunk Market

Exponential-e sees no evidence presented by Ofcom (reference BCMR 6.141) of a competitive national AI trunk market? The issue here is of national coverage and not simply that there are a few competitive routes between the major cities. In addition, that these trunk products remain both available and competitive when one or both ends reside on CP equipment located in the Access Locate area of a BT exchange?

Although the availability of diverse Dark Fibre into BT Exchanges around the country is slowly growing, there is an issue of scale. Even large CPs do not, during the initial deployment, have limitless budgets to purchase and light dark fibre into BT exchanges (evidenced by the number of BES and EBD circuits that exist for LLU operators). CPs are more likely to initially deploy more modest capacity to connect up a new investment in a BT exchange. The question of the reality of national available 1Gig (moving to 10Gig) alternative "Trunk" supply between BT exchanges

that would eliminate a CPs dependence on Openreach, should be a significant factor in Ofcom's thinking on AI Trunk restrictions.

Exponential-e observes that the national supply into BT exchanges of non-BT 1Gig alternative "Trunk" circuits is extremely limited leaving BT with SMP. Openreach will often hide behind their interpretation of AI "Trunk" (previously undefined by Ofcom) and inhibit optimal network designs, forcing CPs to be creative with the limited reach Openreach products and restricted EBD routing that can double in price if a CP can't afford to fully replicate BT's network topology.

#### 4. BT Exchange Space and High Density Handover.

4.1. It is a constant area of concern that CPs have been driven to press Openreach to develop a "high density handover" variant of EAD due to the cost and availability of space in BT exchanges. Whereas BT LoBs, (who are consuming more EAD circuits than all CPs combined), seem not to be under the same pressure. This implies to CPs that space in BT exchanges is not an issue for BT itself and Exponential-e welcomes exchange space being allocated on an EOI basis.

However, Ofcom should consider that this will only start to impact BT LoBs when they exhaust their current space allocations.

4.2. Ofcom should note that most CPs wanted to opt for the "Direct Connect" variant of High Density Handover, where Openreach provision fibre with an NTE at the end customer premises that directly connects into a CPs Ethernet platform without the need to provision an additional NTE at the exchange end. Openreach however, simply refused to progress that design variant stating that it did not fall in line with their business strategy and counter offered the VLAN variant.

4.3. CPs are extremely concerned that this VLAN form of High Density Handover requires Openreach to provision Ethernet aggregation equipment into BT exchanges, a solution that was firmly rejected by them on cost grounds when previously part of the design required to offer CPs access circuit backhaul to CP equipment located in TANs in the last BCMR. In contrast, the Direct Connect variant is judged by CPs to be a cost saving to Openreach and also offers a dramatic increase in CPs ability to perform Operations, Administration and Maintenance (OA&M) on EAD circuits. Openreach's total resistance to the concept is of great concern and is inhibiting badly needed innovation in the market.

4.4. Exponential-e considers that the form of wording in BCMR 11.13 does not form any kind of strong directive to BT in this key area and we fear that this essential solution to the major problem that BT exchange space being a finite resource could be

resisted or biased against CPs. Even if such a product is funded and deployed by Openreach, past behaviour shows that BT will chose an approach to migration that advantages itself above CPs, consuming available migration credits in the process.

- 4.5. Exponential-e requests that Ofcom considers placing significant focus on this key issue both during its BCMR deliberations and through the lifetime of the High Density Handover development.

## LLCC Issues:

### 5. Cost Orientation

5.1. Exponential-e agrees with UKCTA that Ofcom has failed to consider the full impact of removing cost orientation in the LLCC proposals. The case to restore this crucial form of ultimate safety net to the LLCC is discussed in detail in the UKCTA response and Exponential-e fully supports that position.

### 6. WECLA

6.1. Exponential-e is greatly concerned with Ofcom's proposal to relax the charge control on the WECLA area to RPI-RPI creating a substantial differential as compared with the control of RPI-12 outside the WECLA area.

6.2. Our case challenging the very basis for the calculation of the WECLA footprint and Ofcom's calculation of BT holding only a 41% market share for AISBO services in the WECLA footprint is made in the BCMR section of this document.

6.3. If there were to be confirmation of the finding of a competitive market for AISBO business circuit access supply in the WECLA area, it would follow that BT would have to lower its pricing in order to compete. Exponential-e observes that BT have not been prevented from creating such a pricing differential under the current (in force) LLCC but have failed to do so, other than some temporary offers that have long since expired. The evidence of such long term market pressure does not seem to back-up Ofcom's assertion? Indeed, Exponential-e's view is that BT have been able to maintain its pricing in London by the very nature of its SMP.

6.4. Allowing BT to have a pricing differential of around 9% (depending on RPI) where WECLA circuit prices could actually be higher than the rest of the country seems counterintuitive and if BT were to actually *raise* prices in London, this would only support Exponential-e's assertion of BT's SMP.

6.5. In LLCC 8.13 Ofcom states that *"If BT continued to charge up to the safeguard cap, this could provide a greater potential for profitable investment in competing infrastructure"*. Exponential-e has argued in the BCMR section above that Ofcom has underestimated OCPs ability to raise sufficient capital to build competitive duct and fibre infrastructure into business premises. Even if such capital was available in these recessionary times, the time taken for the mass deployment of enough non-BT infrastructure across the entire WECLA area in order to even start to compensate for potential immediate price increase from BT would be considerable.

6.6. Ofcom has argued that surely it would be same issue for BT LoBs? Exponential-e's response is that BT Group can easily compensate for this by moving profit from Openreach to compensate for lower retail margins experienced by BT LoBs. In effect BT Group is making margin on EAD circuits at the Openreach level and then double margin in BT downstream businesses. Higher margins in Openreach easily

compensate lower margins at the retail level, a luxury that CPs do not have to play with.

## 7. Reallocation of Costs

7.1. LLCC 6.6 proposes the reallocation of £101m of costs from the TI basket to the Ethernet basket. LLCC 6.83 also discusses including various unquantified 21CN costs into the cost base. Exponential-e would wish to question these decisions.

7.2. In the first instance moving some common costs from TI to AI (such as duct) calls into question the overall fair allocation of BT duct costs into the appropriate cost baskets that Ofcom use.

7.3. Ofcom have not detailed any other categories other than “duct” in order that CPs have an opportunity to verify the appropriateness of this proposal and as such, Exponential-e opposes this measure until a suitable form of transparency can be offered.

7.4. As to moving the cost of duct into the Ethernet cost basket, Exponential-e questions if this has been done on an appropriate basis? How, for example has the use of duct by the biggest single programme of national fibre deployment ever undertaken by BT ie. FTTC and FTTP been taken into account?

7.5. LLCC 6.83 states that “... *given that the 21CN upgrade was a necessary part of the investment required to provide the networked Ethernet services, EAD, EBD and BTL, which we are using as our reference for costs, it is necessary to have these costs included in the cost base*”. Exponential-e would wish to challenge all or part of this statement by Ofcom.

7.5.1. CPs can see no dependence on 21CN for the delivery of EAD circuits? There is no visible network component that is dependent on part of the 21CN network for its provision. Main links extensions to EAD-LA type circuits are carried out using EAD dedicated fibre extensions and not via the 21CN network.

7.5.2. This leaves two other possibilities:

7.5.2.1. The system costs to provide L2C and T2R functionality in EMP. If a proportion of EMP costs have been included here, then we must unravel any association with the value attributed to the Openreach Industry Commitment (OIC) to add Ethernet to EMP that was offered up by Openreach in order to avoid the cost of full system separation. Ofcom need to avoid any inadvertent double counting of EMP costs.

7.5.2.2. The Operational costs of providing network management. First the method of provisioning network management connectivity to EAD shelves and circuits has been the use of dedicated BT-GS supplied ADSL infrastructure and not using a common 21CN form of management network in exchanges. Second, the cost of the network management staff and systems needs close scrutiny such that only an appropriate proportion of those functions have their costs put into the Ethernet basket. If the

Openreach Network Operations Centre (NOC) also supports other significant products and networks such as NGA (FTTC/FTTP), Ofcom needs to ensure that only an appropriate proportion of costs are included in the Ethernet basket.

7.5.3. EBD only uses a proportion of the BT WDM network previously known as Orchid. This WDM network was built for BT to provide infrastructure connectivity for itself and EBD happened to be built using that transport component rather than it being dedicated to EBD. Exponential-e would request that any inclusion of the costs of this WDM network be reviewed to ensure that only an appropriate amount is apportioned to Ethernet and also that Ethernet does not carry the costs of any unused capacity in that network that unless Orchid was dedicated to Ethernet (which it is not) should be born elsewhere in the BT costs allocations.

## 8. Service Level Guarantees (SLGs)

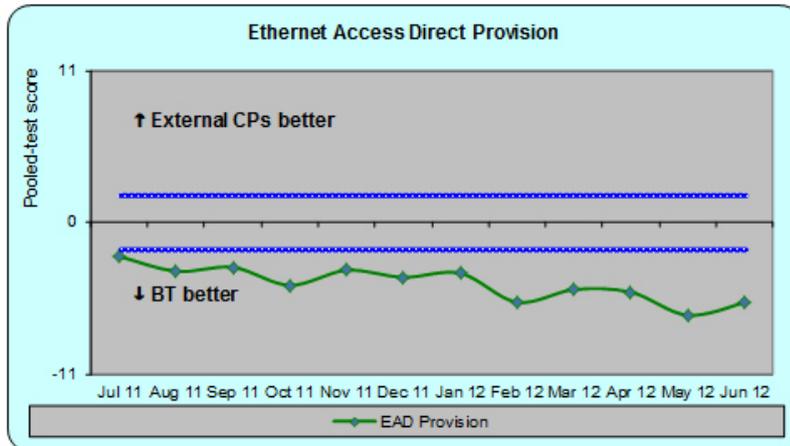
- 8.1. Exponential-e would welcome Ofcom tasking the OTA to perform the same analysis and overhaul of how Ethernet SLGs are measured and applied as is being undertaken for the Copper community.
- 8.2. The entire CP community is suffering excessive lead times for Ethernet products and particularly for EAD.
- 8.3. Exponential-e observes that Openreach has perfected how it measures delivery times and its ability to in effect “stop its own clock” blaming the CP or end customer for many delays that are inappropriate. It has also developed a method to inappropriately include a flexible front end to the delivery process that is excluded from its SLG measurement clock.
- 8.4. Exponential-e objects to current position where Openreach has allowed its network infrastructure to run out of capacity in areas of common network infrastructure to be a valid reason for exclusion from SLG calculation and payment. Examples are as follows from the SLA Clauses Section 2.3 of the Ethernet contract:
  - 8.4.1. Fibre Spine Cable
  - 8.4.2. Core Network Cable
- 8.5. Openreach appears to be running an EAD circuit provisioning process that either deliberately or inadvertently favours BT LoBs.

The following chart shows that by BT’s own KPIs, the EAD provisioning process continues to favour BT itself<sup>2</sup>:

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<sup>2</sup> Chart located at the following URL:  
<http://www.btplc.com/Thegroup/RegulatoryandPublicaffairs/Ourundertakings/KeyPerformanceIndicators/KeyProductPerformanceIndicators/BackhaulandWholesaleExtensionServices.htm>

## Ethernet Access Direct Provision



EAD Provision continues to trend outside of the control limits in favour of BT CPs.

Note, analysis shows performance imbalance remains wholly due to disproportionate ratios of a unique failure type attributed to the Communication Provider (CP) & End User (EU) instigating delays to provision orders.

## 9. Migration Credits

9.1. Whilst Exponential-e welcomes the concept of Migrations Credits, with the experience of product migration issues over the last 10 years, we are concerned that the proposed credit may not achieve its intended purpose and could be used by BT to:

9.1.1. Cushion BT's charge control obligations.

9.1.2. -

9.1.3. Only apply credits where a capacity upgrade has also been ordered as currently with WES to EAD migration.

9.1.4. Force CPs to have to purchase a replacement product from scratch at the full install price as currently is the case with many of the migration scenarios for CPs to move from WES to EAD.

9.2. What seems missing is Ofcom's validation of the application of Migration Credits as part of the process and to not simply wait for a CP to dispute a case that has become publically visible. Perhaps the OTA could perform a function of having to approve the application of Migration Credits to ensure that they are targeted as intended.

## 10. MISBO

10.1. Exponential-e welcomes Ofcom's proposal to extend the charge control to single-service Ethernet above 1Gbit/s.

10.2. It is assumed that singling out this specific use of MISBO is where CPs use one of Openreach's MISBO products (such as OSA) for backhaul purposes to substitute for legacy high bandwidth products that are only capable of supporting a single interface such as WES or BES 10Gbit/s?

- 10.3. Exponential-e is concerned that Openreach may either choose not to supply a single interface OSA solution or may opt to classify any OSA based solution as *multi-interface capable* and hence circumvent the charge control?
- 10.4. There is also the ambiguity of an OSA *hub and spoke* design that is designed to offer multiple single point to point connections from a common hub, making it in effect a point-to-multi-point solution. In this case the hub is not a single interface potentially leading to Openreach designating that all of it falls outside the charge control?
- 10.5. In light of the above, Ofcom may wish to re-consider its approach to BT's request for exemption from their Undertakings for MISBO services in the WECLA area with respect to single-service Ethernet above 1Gbit/s.
- 10.6. For information, Exponential-e opposes BT's request for exemption from their Undertakings for MISBO services in the WECLA area.

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