

## **Comments:**

Due to Openreach not existing in Northern Ireland the market has been left with no perceived competition and the ability of BT competitors to reduce BT's monopoly position has remained unchanged.

### **Question 1: Do you agree with our proposed changes to BT's systems separation obligations? If not, why not?:**

We object to any relaxation of BT's undertakings, including system separation obligations, as BT Retail appear to have the resources to deliver marketing strategies to fight competition and we as a small reseller have had to invest over £100k to become WLR3 compliant, Openreach and Wholesale must be forced to deliver.

### **Question 2: Do you agree with our proposed change of approach to measuring BT's progress on product EOI? If not, why not?:**

We disagree with any changes until BT Retail and all CP are on the WLR3 platform

### **Question 3: Do you agree that the package of additional Openreach developments and the new Undertakings commitments that relate to them are appropriate? If not, why not?:**

We disagree until parity of service transfer is available

### **Question 4: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to remove the IBMC date of 1 July 2010 for Featureline? :**

BT Retail previously sold Featureline to customer in Northern Ireland to prevent CPS being activated on the line.

We request that IBMC be retained on Featureline as the issue has been created by BT Retail.

### **Question 5: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to remove the IBMC date of 1 July 2010 for Featurenet? :**

No opinion

### **Question 6: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to remove the IBMC date of 1 July 2010 for Megastream Ethernet using ASDH2 technology?:**

No opinion

**Question 7: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to remove the IBMC date of 1 October 2010 for Wavestream Connect and Wavestream Regional?:**

No opinion

**Question 8: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to continue to maintain the installed customer base with contracts entered to prior to 31 December 2007 on the non EOI legacy Media & Broadcast products?:**

No opinion

**Question 9: Do you agree that, as a consequence of the revised approach to customer migration to EOI products, Ofcom should agree to this request from BT to remove the IBMC date of 1 July 2010 for Redcare CCTV services?:**

No opinion

**Question 10: Do you agree that Ofcom should agree to an exemption for the cabling of Featurenet connections to existing small customers' sites to allow for Featurenet SRUs to be exempted from equivalence until the SRUs are withdrawn from service or replaced?:**

No opinion

**Question 11: Do you agree that Ofcom should agree to this request from BT for an exemption to allow the Messaging & Bill Direct support team to continue to access data from Openreach's OSS until such time as Openreach's OSS physical systems separation is completed? Please also state whether you agree for Director level review of the operation of end user access controls to be revised from a quarterly basis to a six-monthly basis. :**

No opinion

**Question 12: Taking into account all of the analysis and considerations in this document, do you agree that we should grant the variation to the Undertakings as set out in Annex 5?:**

We are strongly opposed to any changes to the undertakings that allow BT to delay full EOA and request Ofcom put in place a Northern Ireland strategic plan to

stimulate competition as directed by the EU where one supplier has a monopoly position in a geographic area.