

Your response

Question	Your response
<p>Question 1: Do you agree with our proposals to set conditions under which remaining regulation of existing copper-based services would be withdrawn?</p>	<p>It is agreed that in order to move to the targets of fibre-based access infrastructure, there will have to be a method by which most users find fibre access to be cost effective and therefore the most compelling method.</p>
<p>Question 2: Do you agree with our proposal that those conditions should take effect two years after Openreach has given notification, in respect of an exchange, notifying that fewer than 10% of relevant premises remain on copper-based services in the completed exchange, and only where measures are in place to support vulnerable consumers?</p>	<p>We are primarily concerned with the impact on critical national infrastructure, which relates to question 3.</p> <p>However, it is important that a very clear view is obtained – by Ofcom - of what services are available to ensure that any end user – and particularly vulnerable users – are not disadvantaged or put at risk by de-regulation.</p> <p>It is not clear at present what solutions are in place from communications providers to cover building and personal alarms and replacement ‘lifeline’ telephony services to users who do not currently have, or could not afford, broadband connectivity over any access technology.</p> <p>For example, many vulnerable users might struggle with a technology uplift that requires self-installation.</p> <p>A result of de-regulation might be a significant increase in costs of providing essential services to vulnerable users, requiring ongoing copper access, which would be beyond their reasonable financial means.</p>
<p>Question 3: Do you support the exclusion of services that support CNI from our proposals allowing for full copper deregulation?</p>	<p>We support the exclusion of Critical National Infrastructure from these proposals.</p> <p>Providers of Critical National Infrastructure rely on telecommunications services to connect extensive remote-site networks. In the case of</p>



the utilities industries, the supply of electricity, gas and water employs outstations, many of which have traditionally used copper access for voiceband telemetry and control systems.

The utilities providers in the UK have spending and investment controlled and monitored by the relevant regulatory body, with asset plans covering several years at a time. Our experience is that, since PSTN end of life has been announced, utility providers are already facing a substantial cost and logistic challenge of providing alternative non-voiceband connectivity to their remote outstations. Projects already in progress will be using copper access for this purpose.

It will be unacceptable to critical national infrastructure providers, if further substantial costs are caused by the deregulation of copper access services. Regulation must pragmatically continue to apply in order that CNI services are maintained within the cost and operational constraints of the organisations involved.