

[Redacted]  
Executive Director for Strategy and Regulation  
TalkTalk Telecom Group PLC  
**By email**

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Competition Policy Manager  
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11 May 2020

Dear [Redacted],

### Wholesale fixed telecoms market review, consultation clarification

I refer to your further email to us of 1 May 2020 in response to our letter to you of the same date.

In our letter we provided you with [further clarifications](#) in response to five questions about our [Wholesale Fixed Telecoms Market Review 2021-26](#) consultation, which we published on 8 January 2020.

Your further email follows up on our response to your first question about our geographic market analysis.<sup>1</sup> You note that this analysis is, in part, based on a forecast of non-BT MSN FTTP build (i.e. build by Virgin Media, CityFibre and FibreNation) to March 2026. But you could not see in our consultation document the actual assumption we used for non-BT MSN FTTP build (i.e. X million premises passed by March 2026). You asked us for this figure.

As part of our work pre-consultation, we issued information requests to Virgin Media, CityFibre and FibreNation requesting details of their network build plans to 2026. However, as explained in our consultation, we used these build plans to consider whether, for each individual postcode sector, there is likely to be rival (non-BT) MSN build covering at least 50% of premises by 2026 (taking into account an operator's existing and new build in aggregate). In addition, and as we explained in our previous response, the plans we got from network operators had different information of varying levels of detail, so we mapped some of these plans to postcode sectors using a cluster analysis, as set out in [Annex 8](#).

In carrying out our analysis, we did not at any stage add together the assumed premises passed from each operator's build plan, as this was unnecessary. We therefore did not produce an overall assumption or forecast of non-BT MSN planned build in the course of our analysis. As such, any number provided to you would not be a number on which we relied in developing our proposals.

In any event, we have considered whether it would be appropriate to now calculate and provide you with the aggregate figure for the assumed premises passed from the build plans we received from Virgin Media, CityFibre and FibreNation in response to our information requests. In light of the small

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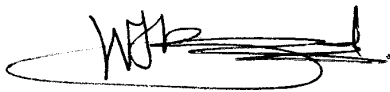
<sup>1</sup> See Question 1 in our [further clarifications](#).

number of operators from which this data was gathered (and noting CityFibre's recent acquisition of FibreNation<sup>2</sup>), we consider that it may be possible to obtain commercially confidential information from this figure. We therefore do not believe that disclosure of this aggregate figure would be appropriate.

Finally, we do not consider that disclosure of this aggregate figure is necessary for TalkTalk to engage with, and respond in a meaningful way to, our consultation proposals. As explained above, this is not a figure that we have calculated or relied on in developing our proposals.

We intend to publish this response on our website alongside other corrections and clarifications which we have made in respect of this consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'W. Izzard', is written over a horizontal line. The signature is stylized and somewhat cursive.

Warwick Izzard

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<sup>2</sup> CityFibre, Press Release, [CityFibre completes its acquisition of FibreNation increasing its rollout plans to pass up to 8 million premises](#), 27 March 2020.