

Surf Telecoms Response

Number	Question	Response
Scope and Coverage of the Data		
Question 1	Are you aware of any fixed network operators that have access infrastructure that Ofcom has not requested data from that are likely to have a material impact on our network reach or service share analysis?	No we are not aware of any fixed Network Operators that have access infrastructure that Ofcom has not requested data from that are likely to have a material impact on our network reach or service share analysis.
Data processing		
Question 2:	Are there any missing circuits in the leased line data you provided to Ofcom? If so, please provide your best estimate (together with, if possible, a lower and an upper-bound estimate) of the number (or percentage) of circuits that are potentially missing and indicate whether they are likely to be accounted for primarily by a particular set of interfaces or bandwidths.	Whilst it appears that all our leased line data is complete as submitted. Some Bandwidth data is missing. [redacted] Some postcode information was also missing. [redacted]
Question 3:	Are there other factors relevant to how your leased line sales and purchases are recorded that have implications for Ofcom's service share analysis?	No there are no other relevant factors.
Question 4:	Do you agree with our approach to classifying circuits that are delivered using WDM technology? Have we correctly classified circuits as WDM in the data you have provided, based on our current definition?	Yes we agree with your approach to classifying circuits using WDM technology.
Question 5:	Do you agree that 'Ethernet over SDH' circuits should be classified as Ethernet circuits? If not, please explain why.	Yes, we agree with the way you have classified SDH as Ethernet circuits.
Question 6:	Do you agree that presenting a service shares range is the most appropriate way of quantifying the uncertainties involved in identifying network sites for the purposes of	Yes, we agree with your approach. It seems an appropriate response.

	this review? Are there alternative methodologies for dealing with this issue?	
Question 7:	Do you agree with our preferred approach of estimating the supply of wholesale leased lines by counting 'on-net' circuits only? Do you have any concerns with this approach?	The approach defined in the document seems the most appropriate in circumstances where on and off net circuits have not been defined. However we are confident that we have submitted our data correctly,
Question 8:	With respect to missing information, do you agree with our proposed approach of using uplifts for three variables and presenting ranges for two variables? Should we consider alternative methodologies for dealing with missing information?	It is agreed that if you were not provided with the appropriate data by other CP's, the methodology used seems the best approach in the circumstances.
Question 9:	Do you have any views on other aspects of our data processing and cleaning, as set out in Annex 7?	With reference to the cleansed data for network nodes and flexibility points; it proved very difficult to correlate the information we submitted with the cleansed data sets returned by Ofcom. We did not have sufficient resources to confidently cross check all the data; however we are confident that we submitted the original data correctly and have to trust that this proves sufficient.
Data Outputs		
Question 10:	Do you have any comments on our methodology for processing data on flexibility points and business locations in light of our network reach outputs? Would you suggest alternative methods or assumptions?	No further comments, your methodology appears to be a series of logical assumptions.
Question 11:	Do you have any comments on our methodology for processing circuit data in light of our service share outputs? Would you suggest alternative methods or assumptions?	No further comments, your methodology appears to be a series of logical assumptions.