

Dear Ofcom,

I am an ordinary consumer of UK telecoms services, a retired businessman. Much of the Internet access that I use, directly and indirectly, depends on the Openreach network.

To allow Openreach to benefit from a new mean average standard for repair times adjusted to allow for the difficulty in repair. is, quite obviously, a dodge – and a rather obvious one at that.

My reasons for stating this should be obvious to anybody outside the industry: the end-customer cares not at all, whether a fault is due to a problem that easy to fix or a hard. It's all the same to the customer; a connection either operates to standard, or it doesn't. The customer can expect the regulator to make an average allowance for fixing all faults. Performance will, of course, always fall short of 100%, but compensation provided for in the supply contract will apply and the probable compensation payout be taken into account by the provider in its calculations.

As a telco cannot absolutely guarantee a particular level of service on any one connection, doesn't mean that it should not be held to a standard and win or lose accordingly. Then nobody will be pulling the wool over anybody's eyes.

Is occurs to me that acceptance of the Openreach proposal would be a classic example of the capture of the regulator by an industry. Just because the industry has to accept internally a stochastic approach to performance targets, does not mean that the same approach should be taken forced upon the industry's customers. By analogy, the bookmaker may know that he has to rely on probability in setting a price, but the punter is entitled to be certain that, if his horse wins the race, his bet will be paid out.

Ofcom should go back to simple principles, think like a customer and drop this proposal.

Yours sincerely,