

Your response

Question	Your response
Question 1: Do you agree with our assessment of the Frontbook ARPU share offer and the Box Swap offer as set out above?	Confidential? – N <i>No, we do not agree, Ofcom should apply a shorter customer lifetime assumption to its analysis of these offers and should also do sensitivity testing on the reality of discounted Altnet pricing against the REO range.</i>
Question 2: Do you agree with our assessment of the Incremental New to Openreach Customer Offer as set out above and our proposal to direct Openreach to withdraw the offer?	Confidential? – N <i>Yes, we agree that the offers should be withdrawn. We disagree with Ofcom's analysis of the conditionality elements of the offer. We consider the conditionality to be loyalty inducing and to be designed to both deter ISPs from starting to use new Altnets and to withdraw from existing trading arrangements with Altnets</i>
Question 3: Do you agree with our assessment of the Geographic Incremental New to Openreach Customer Offer as set out above?	Confidential? – N <i>No, we do not agree with Ofcom's analysis and proposal to allow Openreach to implement this offer. Ofcom needs to apply a shorter customer lifetime to its analysis of this product and test the resulting prices against the actual prices applied by Altnets in the market (around 15-25% discount against the relevant Openreach price).</i>
Question 4: Do you agree with our assessment of the Incremental Ethernet Net Demand Offer as set out above?	Confidential? – N <i>No, Ofcom needs to Analyse the level of the priciness resulting from the many overlapping Ethernet offers compared with the costs of a reasonably efficient operator of providing the equivalent services. Not doing so, means that Ofcom's regulatory objective of promoting network competition in the LLA Area 2 market is not being implemented.</i>

Please complete this form in full and return to Openreachcommercialoffers@ofcom.org.uk.