Additional comments:

A mechanism to be implemented that enables access to Wholesale Backhaul Internet connections at fair and reasonable rates to enable and encourage small self help groups.

Licensed Telecom operators with capacity (or where capacity can be added viably) should be obliged to provide connectivity at reasonable / prescribed cost to Alt Nets and/or community schemes to enable alternative internet services proposals based on a commercial basis, including not for profit, that meet some minimum requirements such as support from local Parish / Town councils or the support from a minimum percentage of people in a defined geographical area. (the area to be defined by the group, not some arbitrary existing grouping, eg postcode / parish boundary)

This alternative service should be available irrespective of existing service in an area be that having been installed through a companies investment or through government subsidy. It should be for the community to agree the need (based on existing vs potential quality, speed and cost) and to be able to implement alternative solutions if they beleive a demand exists which they can service.

Question 1: Do stakeholders agree that promoting effective and sustainable competition remains an appropriate strategy to deliver efficient investment and widespread availability of services for the majority of consumers, whilst noting the need for complementary public policy action for harder to reach areas across the UK?:

yes

Question 2: Would alternative models deliver better outcomes for consumers in terms of investment, availability and price?:

yes

Question 3: We are interested in stakeholders? views on the likely future challenges for fixed and mobile service availability. Can a ?good? level of availability for particular services be defined? What options are there for policy makers to do more to extend availability to areas that may otherwise not be commercially viable or take longer to cover?:

See earlier comments

Question 4: Do different types of convergence and their effect on overall market structures suggest the need for changes in overarching regulatory strategy or specific policies? Are there new competition or wider policy challenges that will emerge as a result? What evidence is available today on such challenges?:

Question 5: Do you think that current regulatory and competition tools are suitable to address competition concerns in concentrated markets with no single firm dominance? If not, what changes do you think should be considered in this regard and why?:

Existing arrangements with Telco suppliers that use public money should not be allowed to hide behind NDAs and Commercial Sensitivity arguments. Projects that receive significant funding (eg. greater than 20%) should forgo the ability to withhold commercial and strategic information relevant to those residents and tax payers in the areas affected.

Question 6: What do you think is the scope for sustainable end-to-end competition in the provision of fixed communications services? Do you think that the potential for competition to vary by geography will change? What might this imply in terms of available regulatory approaches to deliver effective and sustainable competition in future?:

Provision of services should not be allowed to be exclusive to a single, or even two or more, providers. Telco providers should provide points of access to their existing networks at key logical points to enable alternative small suppliers to concentrate on local needs and not to be shut out because of the large investment required in Backhaul. Ideally small local providers should have the ability to connect at the Backhaul level with a choice of providers and not be prevented concentrating solely on the local delivery problems which the existing providers do not wish to tackle.

Question 7: Do you think that some form of access regulation is likely to continue to be needed in the future? If so, do you think we should continue to assess the appropriate form on a case by case basis or is it possible to set out a clear strategic preference for a particular approach (for example, a focus on passive remedies)?:

Question 8: Do you agree that full end-to-end infrastructure competition in mobile, where viable, is the best means to secure good consumer outcomes? Would alternatives to our current strategy improve these outcomes, and if so, how?:

Question 9: In future, might new mobile competition issues arise that could affect consumer outcomes? If so, what are these concerns, and what might give rise to them?:

Question 10: Does the bundling of a range of digital communications services, including some which may demonstrate enduring competition problems individually, present new competition challenges? If so, how might these issues be resolved through regulation, and does Ofcom have the necessary tools available?:

Question 11: What might be the most appropriate regulatory approaches to the pricing of wholesale access to new and, risky investments in enduring bottlenecks in future?:

Question 12: How might such pricing approaches need to evolve over the longer term? For example, when and how should regulated pricing move from pricing freedom towards more traditional charge controls without undermining incentives for further future investment?:

Question 13: Are there any actual or potential sources of discrimination that may undermine effective competition under the current model of functional separation? What is the evidence for such concerns?:

Question 14: Are there wider concerns relating to good consumer outcomes that may suggest the need for a new regulatory approach to Openreach?:

Question 15: Are there specific areas of the current Undertakings and functional separation that require amending in light of market developments since 2005?:

Question 16: Could structural separation address any concerns identified more effectively than functional separation? What are the advantages and challenges associated with such an approach?:

Question 17: What do stakeholders think are the greatest risks to continuing effective consumer engagement and empowerment?:

Question 18: What indicators should Ofcom monitor in order to get an early warning of demand-side issues?:

OFCOM should carry out randomised speed quality checks across the entire country and highlight those results at the very lowest end. The current varioation of sub MBs to 1GB links makes averaging of results meaningless.

Benchmarking should also be made against services such as VoIP, Cloud computing, Streaming services (up to and beyond 4K) that provide a 'real-life' experience for consumers rather than the technical numbers alone.

Question 19: What options might be considered to address concerns about consumer empowerment at each stage of the decision-making process (access, assess, act)? What more might be required in terms of information provision, switching and measures to help consumers assess the information available to them? What role may Ofcom have to play compared to other stakeholders (including industry)?:

Question 20: Are there examples in competitive or uncompetitive sections of the market where providers are not currently delivering adequate quality of services to consumers? What might be causing such outcomes?:

Cornwall.

Remote parts of Cornwall have not been addressed by Superfast Cornwall.

Even those areas that have been addressed rely on inferior technology that is effectively a technical cul-de-sac, The equipment installed over the last 4 - 5 years will be outdated, does not have an upgrade path and will not be fit for purpose in the next 5 years.

Question 21: What further options, if any, should Ofcom consider to secure better quality of service in the digital communications sectors?:

Question 22: Might there be future opportunities to narrow the focus of ex ante economic regulation whilst still protecting consumers against poorer outcomes?:

Question 23: Where might future network evolutions, including network retirement, offer opportunities for deregulation whilst still supporting good consumer outcomes?:

Question 24: What are the potential competition and consumer protection implications of the rise of OTT services? Might the adoption of such services enable future deregulation without raising the risk of consumer harm?:

Question 25: Are there any areas where you think that regulation could be better targeted or removed in future? What would be the benefit of deregulation as well as the main risks to consumers and how these could be mitigated? Please provide evidence to support your proposals.: