

Your response

Question (Volume 2)	Your response
<p>Question 2.1: Do you agree with our description of retail markets? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes, we agree with your description of retail markets.</p> <p>In our opinion, we believe that the idea that Broadband+Line Rental is a “bundle” will disappear in the minds of consumers in the future. Bundles will be Broadband + Voice and/or Entertainment and/or Security Monitoring and/or Gaming and/or Health Monitoring and/or just all OTT. In turn this will lead to the entry of new retailers into the market, and a reduction in the current dominance of the retail market by Virgin, Sky, BT and TalkTalk.</p>
<p>Question 3.1: Do you agree with our provisional conclusion on physical infrastructure product market definition? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>
<p>Question 4.1: Do you agree with our provisional conclusion on physical infrastructure geographic market definition? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p> <p>In particular, we see the scale difference between Openreach and any emerging local competitor to be very substantial and the time needed to deploy competing infrastructure at scale is very long meaning that the Openreach scale advantage will be maintained for a considerable period.</p>
<p>Question 4.2: Do you agree with our provisional conclusion on the application of the three criteria test to the physical infrastructure market? Please set out your</p>	<p>Confidential? –N</p> <p>Yes.</p>

<p>reasons and supporting evidence for your response.</p>	<p>Without intervention ex-ante, the prospect of or just the uncertainty surrounding possible anti-competitive behaviour or market and product re-definition by the incumbent will stifle investment in competing infrastructure.</p>
<p>Question 5.1: Do you agree with our provisional finding on SMP and resultant competition concerns in the physical infrastructure market? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>
<p>Question 6.1: Do you agree with our provisional conclusions on product market definition for wholesale networks? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes, with the caveat that we believe that with the ongoing development of fibre technology (XGS-PON, DWDM etc.) and the integration and simplification of vendor equipment, the markets for broadband local access and leased line services are converging, although we believe that this process will still be ongoing in 2026.</p>
<p>Question 7.1: Do you agree with our provisional conclusions on geographic market definition for wholesale networks? Please set out your reasons and supporting evidence for your response.</p>	<p>[X]</p> <p>Confidential? –N</p> <p>Yes.</p>
<p>Question 7.2: Do you agree with our provisional conclusion on the application of the three criteria test to the wholesale inter-exchange connectivity market? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>

<p>Question 8.1: Do you agree with our provisional SMP findings and resultant competition concerns for wholesale networks? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes. In the review period, we believe that it is very unlikely that any combination of competitors will achieve a market share even close to 50%.</p>
<p>Question 9.1: Do you agree with our proposal not to regulate WFAEL, ISDN2 and ISDN30 markets on the basis that they no longer fulfil the three criteria test set out in the EC Recommendation? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes. PSTN switch-off is on the way and Openreach’s voluntary commitments provide appropriate short-term support without additional regulation.</p>
<p>Question 10.1: Do you agree with our proposal not to regulate WBA market on the basis that it no longer fulfils the three criteria test set out in the EC Recommendation? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>

Question (Volume 3)	Your response
<p>Question 1.1: Do you agree with our proposed approach to remedies? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y</p> <p>[X]</p>
<p>Question 2.1: Do you agree with our proposed approach to Copper retirement? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes, these seem reasonable, balancing the needs of more vulnerable consumers with the cost reduction available from copper switch-off.</p>
<p>Question 3.1: Do you agree with our proposed general remedies? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y</p> <p>[X]</p>

<p>Question 4.1: Do you agree with our proposed specific PIA remedies? Please set out your reasons and supporting evidence for your response.</p>	<p>[X]</p>
<p>Question 5.1: Do you agree with our proposed specific remedies in the WLA, LL Access and IEC markets? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Yes.</p>
<p>Question 6.1: Do you agree with our proposed dark fibre access and dark fibre inter-exchange remedies? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y [X]</p>
<p>Question 7.1: Do you agree with our proposed approach to QoS? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y [X]</p>

<p>Question (Volume 4)</p>	<p>Your response</p>
<p>Question 1.1: Do you agree with our proposals for charge controlling WLA and LL access</p>	<p>Confidential? – Y [X]</p>

<p>services in Area 2? Please set out your reasons and supporting evidence for your response.</p>	
<p>Question 2.1: Do you agree that a RAB based control will achieve our objective in Area 3? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Probably.</p>
<p>Question 2.2: Do you agree that is appropriate to impose a post-build RAB charge control in Area 3? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Yes</p>
<p>Question 2.3: Do you have any comments on our proposed design and method for calculating the proposed post-build RAB charge controls? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N No</p>
<p>Question 2.4: Do you agree with our proposals to charge control LL access services and dark fibre in Area 3? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Yes</p>
<p>Question 3.1: Do you agree with our proposals in relation to charge control design and implementation? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Yes</p>
<p>Question 4.1: Do you agree with our proposals for charge controlling in the IEC markets? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N Yes</p>

<p>Question 5.1: Do you agree with our proposals relating to calculating PIA rental charges? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes.</p>
<p>Question 5.2: Do you agree with the above proposal to introduce the PIA simplified underground lead-in service and the associated timings? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>
<p>Question 6.1: Do you agree with our proposed approach to charge controls for ancillaries? Please provide evidence to support your views. Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? –N</p> <p>Yes.</p>
<p>Question 6.2: Do you agree with our proposals for fair and reasonable obligations for ancillaries not covered by a charge control? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes.</p>