

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>We have reviewed the Consultation document and our position on this question is generally neutral.</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>As per response to Q2.1</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>As per response to Q2.1</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 reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>As per response to Q2.1</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>As pre response to Q2.1</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>As per response to Q2.1</p>
<p>Question 7.1: Do you agree with our provisional conclusions on geographic market definition for wholesale networks? Please set</p>	<p>Confidential? – N</p> <p>As per response to Q2.1</p>

<p>out your reasons and supporting evidence for your response.</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 As per response to Q2.1</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 As per response to Q2.1</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 As per response to Q2.1</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 As per response to Q2.1</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? – N</p> <p>SSEET agrees with the approach to remedies, promoting competition, removing regulation where not needed and protecting consumers.</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>✂</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? – N</p> <p>SSEET do not have specific comments here – the Openreach SOR process has significantly improved over last couple of years and other general remedies are quite standard in the market.</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>Confidential? – N</p> <p>Yes – as currently stated SSEET agrees with the proposed specific PIA remedies and the specified clarifications.</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</p> <p>Yes – as currently stated SSEET agrees with the proposed specific remedies</p> <p>5.42 – ancillary services such as access to the GEA Cablelink should also validate the existing lead times – such as current GEA Cablelink delivery SLAs to allow service providers with no existing GEA Cablelink infrastructure to compete on delivery without having to invest in pre-populating exchanges with Openreach infrastructure.</p> <p>5.47 – SLG payments should also apply to faults on the underlying ancillary services such as GEA Cablelinks where all the VULA services are terminated.</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>✂</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? – N</p> <p>As currently stated SSEET supports Ofcom’s approach to setting directions specifying quality of service (QoS) standards and reporting requirements in relation to Openreach’s QoS performance for services in all relevant fixed telecoms markets.</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 services in Area 2? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>The principle of cost-based price caps are welcomed and we believe will be beneficial to both SSEET and the wider market.</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</p> <p>The principles of a Regulatory Asset Base approach appear to permit cross-subsidising of products. Is this intended?</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</p> <p>No view at present.</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</p> <p>We note that the cash benefit to Openreach of recovered copper sold on is not considered within this consultation paper.</p> <p>We believe that the potential upside is substantial, even with the current downturn in the metals market. Openreach could choose to stockpile the copper “in situ” and recover / sell when the market improves.</p>
<p>Question 2.4: Do you agree with our proposals to charge control LL access services and dark</p>	<p>Confidential? – N</p>

<p>fibre in Area 3? Please set out your reasons and supporting evidence for your response.</p>	<p>We do agree with this approach, as having dark fibre available at cost is very attractive to other operators.</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</p> <p>The proposed changes to inter exchange dark fibre are very relevant should this relate to DFX and we welcome the significant cost reductions outlined in Annex 19. We would ask Ofcom to clarify whether our interpretation is correct.</p> <p>In particular, install charges down 15%, rental down 80% and distance charges (largest factor) reduced by 20%.</p> <p>Proposed reductions in PIA costs (particularly poles) could offer SSEET alternate access strategies.</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</p> <p>DFX rules need further analysis. Where an exchange is deemed to be BT plus 1 CP, there is no guarantee that the CP will have spare fibre to sell. SSEET have had direct experience where a CP has rejected all sales enquiries where there is a competitive situation.</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>The ~60% reduction in overhead networks pricing would be welcomed by SSEET as it will stimulate the demand for services to be delivered via this architecture, extending our virtual reach.</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>As currently stated SSEET are broadly supportive.</p>
<p>Question 6.1: Do you agree with our proposed approach to charge controls for ancillaries? Please provide evidence to support your</p>	<p>Confidential? – N</p> <p>As currently stated SSEET are broadly supportive.</p>

<p>views. Please set out your reasons and supporting evidence for your response.</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>Little seems to change, Openreach repeatedly say that costs in this area are a “bare bones” pass through.</p>