

Consultation response form

Please complete this form in full and return to hullreview26@ofcom.org.uk.

Consultation title	Consultation: Promoting competition and investment in fibre networks - Hull Area Review 2026-31
Full name	[CONFIDENTIAL]
Contact phone number	[CONFIDENTIAL]
Representing (delete as appropriate)	Self
Organisation name	n/a
Email address	[CONFIDENTIAL]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Please tell us how you came across about this consultation.

- Email from Ofcom
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- Heard about it on TV or radio
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- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

Question	Your response
<h2>Volume 2 Market analysis</h2>	
<p>Question 2.1: Do you agree with our proposed market definition for WLA? Please set out your reasons and supporting evidence for your response.</p>	<ul style="list-style-type: none">• Yes - The current definition accurately reflects the need for regulation in the Hull area due to KCOM's historic monopoly, which is enabling over-building by new entrants.• Supporting evidence: In areas like [CONFIDENTIAL] new operators such as MS3 are installing duplicate infrastructure, causing community blight and devaluation of property, which the market definition should consider when assessing effective competition.
<p>Question 2.2: Do you agree with our provisional conclusion that KCOM holds SMP in the supply of WLA products in the Hull Area?</p>	<p>Yes - Agree. KCOM's dominant position is clear, which is why alternative network providers (altnets) are struggling to compete effectively without better access to existing infrastructure.</p>

Question	Your response
Please set out your reasons and supporting evidence for your response.	
Question 2.3: Do you agree with our proposed market definition for LLA? Please set out your reasons and supporting evidence for your response.	N/A
Question 2.4: Do you agree with our provisional conclusion that KCOM holds SMP in the supply of LLA products in the Hull Area? Please set out your reasons and supporting evidence for your response.	N/A
Question 2.5: Do you agree with our assessment of the competition concerns arising from our provisional findings of SMP in the markets we have identified? Please set out your reasons and supporting evidence for your response.	N/A
<h2>Volume 3 Remedies</h2>	
Question 3.1: Do you agree with our proposed approach to remedies? Please set out your reasons and supporting evidence for your response.	<p>Yes - Broadly agree, but with a significant caveat. The focus on promoting competition is good, but the remedies must be strong enough to prevent unnecessary new infrastructure and genuinely protect consumer interests.</p> <p>While I support promoting competition, the current approach focuses too heavily on new infrastructure rollouts without sufficient safeguards against duplication. The remedies should prioritize the use of existing passive infrastructure (ducts and poles) over the installation of new, unsightly telegraph poles in</p>

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	<p>residential areas like [CONFIDENTIAL]. Ofcom should ensure that "promoting competition" does not come at the cost of the local environment and property values.</p> <p>The proposed remedies should place a stronger emphasis on mandatory infrastructure sharing to prevent the environmental impact and visual disruption of new poles. Current voluntary agreements are not sufficient to deter new pole installations.</p>
<p>Question 3.2: Do you agree with our proposed general remedies? Please set out your reasons and supporting evidence for your response.</p>	<p>Yes – General remedies must include a mandatory (rather than voluntary) Code of Practice for pole siting. My experience with MS3 showed that voluntary engagement is often ignored, causing significant stress to residents. Ofcom should mandate that operators prove they have exhausted all underground duct options (PIA) before being granted permitted development rights for new poles.</p> <p>Operators themselves confirm the 'Code of Practice was only voluntary,' demonstrating that a mandatory condition is essential for compliance</p> <p>Ofcom must ensure that the voluntary "Cabinet and Pole Deployment Code of Practice" is given more weight, ideally becoming a mandatory requirement for all operators. This would enforce genuine community engagement.</p>
<p>Question 3.3: Do you agree with the proposed price benchmarking approach and WLA reference offer direction? Please set out your reasons and supporting evidence for your response.</p>	<p>N/A</p>

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<p>Question 3.4: Do you agree with our proposed Ethernet leased lines access remedy and proposed price benchmarking approach for the LLA market? Please set out your reasons and supporting evidence for your response.</p>	<p>N/A</p>
<p>Question 3.5: Do you agree with our proposal to remove the dark fibre access remedy from the LLA market and our proposed transitional period arrangements? Please set out your reasons and supporting evidence for your response.</p>	<p>N/A</p>
<p>Question 3.6: Do you agree with our proposal to remove the requirement to provide annual pricing transparency reports from the LLA market? Please set out your reasons and supporting evidence for your response.</p>	<p>N/A</p>
<p>Question 3.7: Do you agree with our proposed specific remedies to support PIA in the WLA and LLA markets in the Hull Area? Please set out your reasons and supporting evidence for your response.</p>	<p>Yes – Physical Infrastructure Access (PIA) is the key to preventing duplicate infrastructure.</p> <p>The current 'Permitted Development legislation (2015)' allows operators to install poles without planning permission. This regulatory gap enables them to ignore viable PIA options and blights the community with unnecessary infrastructure</p> <p>My experience at [CONFIDENTIAL] highlights that altnets often install new poles without adequately exploring the use of existing ducts, as they are not legally required to do so under current permitted development rights.</p> <p>Ofcom should ensure KCOM is obligated to make their infrastructure "ready for use" to</p>

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	<p>avoid environmental and community impact from over-building.</p> <p>In my area, the lack of effective PIA enforcement has led to a "towering" presence of poles that devalue homes. These remedies must be strictly monitored to ensure altnets are actually using the shared infrastructure rather than choosing the "easier" option of new poles.</p>
<p>Question 3.8: Do you agree with our proposed approach to PIA network adjustments and the rationale for our proposed network adjustment financial limit? Please set out your reasons and supporting evidence for your response.</p>	<p>Yes - I agree with the principle, provided the financial limit is set at a level that actively discourages infrastructure duplication.</p> <p>In my experience at [CONFIDENTIAL], new poles were proposed even though existing infrastructure was present. If the PIA network adjustment limit is too low, operators will find it more cost-effective to erect new, duplicative poles (Permitted Development) rather than clearing blockages in KCOM's ducts. This leads to "community blight" and devalues properties. Ofcom must ensure the limit is sufficient to make duct-sharing the first and most viable choice for every operator.</p> <p>Ofcom should strengthen these remedies to mandate that all technical and financial options for utilizing existing underground ducts are exhausted before any new poles are permitted. The rationale for any financial limit must account for the high 'social and environmental cost' to the local community, which is currently being ignored in</p>

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	<p>favour of purely commercial considerations."</p> <p>In short: The rationale for any financial limit must account for the high 'social and environmental cost' to the local community, which is currently being ignored in favour of purely commercial considerations and represents a regulatory failure to protect residents</p>
<h2 style="color: purple;">Volume 4 Regulatory financial reporting</h2>	
<p>Question 4.1: Do you agree with our proposed regulatory financial reporting SMP condition and directions? Please set out your reasons and supporting evidence for your response.</p>	<p>N/A</p>

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