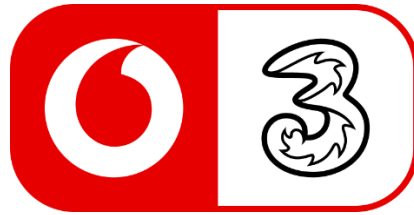


**Response to Ofcom's Consultation:**

## **Promoting competition and investment in fibre networks - Hull Area Review 2026-31**

**Non-Confidential**

**February 2026**



## Introduction

1. VodafoneThree welcomes Ofcom's consultation on the regulation of fixed telecoms markets in the Hull Area for November 2026–October 2031. We support Ofcom's aim to embed sustainable network competition and protect consumer and business outcomes in a region where incumbency advantages remain pronounced despite recent altnet build in a proportion of the city.
2. In summary we support an outcome that:
  - Promotes sustainable long-term competition, not short-term fixes.
  - Ensures wholesale access (inc. PIA & Ethernet) is robust, fair, and non-discriminatory.
  - Is cautious around the removal of remedies (like DFA) while competition remains nascent.
  - Creates an environment that support entry by altnets to reduce prices and give consumers choice.
3. We particularly welcome proposals to improve access to KCOM's ducts and poles (PIA) and to maintain access to existing wholesale services in WLA and LLA. We would sound a note of caution over the proposed withdrawal of Dark Fibre Access (DFA) without strengthened safeguards in leased lines, which risks raising costs for enterprise and mobile backhaul and could blunt nascent competition benefits.
4. To support service choice for mobile, broadband and enterprise customers in Hull, Ofcom need to ensure that any strengthen PIA remedy is both meaningful and practical, improving access terms for KCOM's ducts & poles, including non-discrimination and benchmarking to embed competition. There is also an ongoing need to maintain existing WLA/LLA wholesale services to avoid regression during the 2026–31 period.

## Serving Consumers in Hull

5. While VodafoneThree has historically relied on altnet partnerships (such as with CityFibre) to enable the offering of retail broadband services within Hull. We would like to see the number of premises able to access these retail services increase.
6. Hull remains a distinctive market, with KCOM retaining Significant Market Power within its footprint. Competition is not yet established despite growth from some alternative providers. Continued wholesale SMP remedies are appropriate to embed competition for the 2026–31 period, safeguarding customer outcomes.
7. While altnets have made some progress increasing their share of premises served, too many consumers within Hull have no choice of access network. Improving access to a wider range of retail offers is contingent on a sensibly priced and workable PIA remedy that seeks to overcome structural incumbency.
8. We are supportive of proposals to benchmark KCOM PIA prices and processes to Openreach PIA. An improved Physical Infrastructure Access (PIA) remedy is needed. To be effective, parity must be explicit:
  - Benchmarking KCOM PIA to Openreach on charges and end-to-end processes (surveys, makeready, build windows).
  - Encode non-discrimination and timebound SLAs; introduce expedited dispute resolution (e.g., 30 days) to address delay tactics.
9. We note Ofcom’s proposal to withdraw DFA (after a transition period). Given the role DFA has played in preventing excessive LLA charges, especially critical for enterprise and mobile backhaul, DFA withdrawal should be contingent on a material strengthening of LLA remedies, including more pricing scrutiny around other active LLA products, with benchmarking against equivalent products elsewhere in the UK.
10. If Dark Fibre Access is withdrawn, we are keen to see more cost reflective cost orientation/benchmarking for Ethernet. It is important to safeguard equivalence, with QoS floors for provisioning/repair aligned to national norms and non-discrimination testing comparing KCOM’s internal and external treatment, with publication of KPIs.
11. We welcome a transition plan, setting out clear a DFA sunset schedule, PIA uplift milestones, WLA/LLA activation dates, and a supplier readiness framework. Customer safeguards should prohibit forced migrations where QoS/price equivalence cannot be demonstrated.
12. We continue to support Ofcom’s approach on the production of Regulatory Financial Statements. These are important to maintain an understanding around costs to

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underpin sensible wholesale and retail competition within the area. Absent this information it would be very challenging to deliver robust remedies in the market, harming consumer outcomes.

13. A regulatory climate that encourages innovation and supports both existing and new participants in the Hull telecoms market remains the end goal.
  
14. As the market continues to develop, it will be vital for Ofcom to monitor the impact of regulatory changes, remaining agile in its response to emerging challenges while prioritising network quality, consumer protection, and competitive choice. This will enable Hull to realise the full benefits of investment in fibre infrastructure, establish a level playing field, creating an environment for sustainable competition that delivers for consumers.

END