

Consultation response form

Please complete this form in full and return via email to piaremedy@ofcom.org.uk or by post to:

Shaun Tey
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Consultation title	Consultation on pricing proposals for Duct and Pole Access remedies
Full name	Gordon McCulloch
Contact phone number	[⟨]
Representing (delete as appropriate)	Organisation - please provide the organisation's name below
Organisation name	Zayo UK
Email address	[⟨]
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question 3.1: Do you agree with our proposals for setting the level of the cap on PIA rental charges? Please provide reasons and evidence in support of your views.	Confidential? – N Zayo agrees that a maximum level for the PIA rental seems reasonable. Zayo's view is that the proposed maximum charges as set out in table 1.1 are more sensible than the current charges. Zayo has the
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	<p>benefit of consuming similar products in other countries in Europe and note that the charges are a) considerably lower than current PIA charges, and b) do not introduce artificial and market distorting restrictions of use. For example in France, Orange is mandated to sell duct at prices circa £0.35/m per annum with no restrictions of use. This is of course, subject to availability.</p>
<p>Question 4.1: Do you agree with our proposals for setting a financial limit for network adjustments? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – N The application of Openreach infrastructure costs across all users of the infrastructure will likely be an opaque process and not open to neutral scrutiny. The Financial Limit of £4K to £6K /km is expected to cover what % of requests? How is “normal” and “exceptional” defined?</p>
<p>Question 4.2: Do you agree with our proposals for ancillary charges? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – N Ancillary charges are charged per hour. How does the customer know that the number of hours is reasonable?</p>
<p>Question 5.1: Do you agree with our proposals for BT’s regulatory financial reporting in relation to PIA services? Please provide reasons and evidence in support of your views.</p>	<p>Confidential? – N Reporting seems OK.</p>

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