

Vodafone considers it vital that Ofcom plans effectively to ensure that it maximises the use of its own resources whilst considering the organisational and economic pressures faced by the industry. Vodafone believes that an effective plan would also require the minimisation of parallel work streams to reduce potential resource bottlenecks amongst the stakeholders from which Ofcom requires input.

Vodafone believes that an effective plan cannot be achieved prior to the publication of the conclusions of the Strategic Review of Digital Communications, which will provide further information regarding Ofcom's work priorities for the enterprise sector. It is needless to say that without a clear view on Ofcom's work priority for the business markets in the next Financial Year, the work plan gives a higher degree of attention to residential rather than enterprise markets.

In parallel with the publication of the conclusions of the Strategic Review of Digital Communications, Vodafone urges Ofcom to consider what is needed to ensure that the enterprise market functions effectively, allowing suppliers to provide innovative products, services and price structures, whilst addressing key issues around the lack of access to infrastructure and the inconsistent availability of services and bandwidths.

Vodafone expects that these issues will be addressed in Ofcom's conclusions to the Strategic Review of Digital Communications consultation. As a result of Ofcom's "emerging views" response to the Strategic Review of Digital Communications consultation, Vodafone expects to see also a revised Annual Plan which focuses on work packages that deliver the most benefit to consumers and business users alike, through a programme focused on adapting the regulatory environment to respond to rapidly changing economic circumstances.

Vodafone also welcomes Ofcom's intention to review the General Conditions of Entitlement. In fact, the incremental expansion of the General Conditions has led to a marked lack of consistency, with some of the Conditions to be overly long, encompassing every detail of implementation, where others are very short and rely on associate "guidance" which, however, has regulatory standing. Stripping the conditions back to their original principles will assist communication providers in their compliance efforts and interaction with the conditions. However, Vodafone recognises that undertaking a full review of the General Conditions will be very resource intensive, especially when it leads to the removal of elements of the General Conditions or to the modification of existing Conditions. Nonetheless, no resources have been formally allocated to this project in Ofcom's work plan. Vodafone invites Ofcom to re-consider the allocation of resources to accommodate for this activity.

Finally, Vodafone also notices the inclusion of a challenging activity schedule in Ofcom's Annual Plan. Ofcom will need to ensure that it meets the indicated deadlines for completion of its projects, such as concluding the market review to set new rates for charge control by the 1st of April; failure in doing so may allow Openreach to revise its market prices for overly generous timescales.

To conclude, whilst acknowledging the significance of the work streams defined by Ofcom, Vodafone believes that it is too early for Ofcom to publish an annual plan which works effectively for all stakeholders it seeks input from. Until the conclusions of the Strategic Review of Digital Communications consultation have been published, Vodafone does not

believe that the initiatives accounted for in Ofcom's annual plan respond to changing economic circumstances to the benefit of both consumers and businesses.