

Title:

Ms

Forename:

Aileen

Surname:

Boyd

Representing:

Organisation

Organisation (if applicable):

SSE plc

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: What is your response to this consultation?:

As in SSE's response to the earlier invitation to comment on the 2015/16 annual plan, we very much support Ofcom's work to improve the process of switching provider for consumers by building on the 'Gaining Provider Led' harmonised process that has been mandated for the Openreach copper network. We hope to see Ofcom roll out the principles of this to other types of communication service and underlying technology platform. Given the relative complexity and rapid technological change that characterise the communications retail markets, we consider that the switching processes should be maintained and developed within an industry governance structure and that Ofcom should work to set that structure up, as

discussed in our earlier response. It is entirely consistent with the provision of communications infrastructure being increasingly seen as a 'utility' (most recently in the House of lords Select Committee Report on Digital Skills, published 17 February) that consumer switching processes should be documented, governed and controlled in a similar manner to the way that they are in other utilities such as energy and water.

We have already raised the desirability of reviewing the General Conditions (GCs) in the context of applying different requirements to different types of Communications Provider in areas such as switching and continue to believe that it would be useful to clarify the GCs in this manner.

In similar vein, we note that Ofcom has raised the possibility of reviewing the BT Undertakings in their 10th anniversary year and we also support a review of this fundamental part of the regulatory framework. Furthermore, since publication of the 2015/16 annual plan, BT has announced its intention to acquire a significant UK mobile network operator business. This changes the competitive landscape and we therefore consider that Ofcom will need to reserve capability in the 2015/16 year to consider the implications of this acquisition on competition, whether as part of a review of the Undertakings or as direct work with relevant competition authorities on remedies.