

**Organisation (if applicable):**

SSE plc

**Additional comments:**

We are of the view that the different markets that Ofcom periodically reviews do not align with how the ordinary consumer views his communication service needs when purchasing services or when moving into new premises. Rather than 'narrowband' and 'broadband' reviews, we suggest that the key concepts for a customer are currently fixed line 'voice' and 'data'. On this basis, the current narrowband review is really about assessing the market for provision of fixed line voice services and identifying any areas of Significant Market Power (SMP) in the supply chain for these services.

Ultimately, we believe that voice will be seen as a special form of 'data' and that when that point is reached, the appropriate distinction for reviews will be between 'access' and 'services'. Even today, the high access bandwidths delivered by 'fibre to the cabinet' solutions or a fibre to the premises connection point towards the need for a new approach to protecting customers and promoting competition and innovation in service offerings. SMP can exist over quite small geographic areas in the provision of access connectivity (perhaps even per single connection to a consumer premises) while many different types of service could co-exist and be delivered over the same communications link. We suggest it would be in consumers' interests if the market and regulatory frameworks evolved towards a situation whereby communications access was independently managed to maximise the range of different service offerings available to all consumers and to support them in making active choices from amongst a healthy mix of different, competing providers of those services.