



Waiver of BT's price notification requirements to extend FTTC Simultaneous Provide offer

Explanatory Statement and Consent to a shorter price notification period in a specific case

Statement

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Section 1

Consent to waive a notice period

Introduction

- 1.1 On 4 September 2012, Ofcom published the consultation document and notification entitled 'Waiver of BT's price notification requirements to extend FTTC simultaneous provide offer - Notification of a proposal to give consent to a shorter price notification period in a specific case'¹ (the 'September 2012 Waiver Consultation'). In that document we proposed to give consent to a waiver of the price notification requirements in relation to a two month extension of the Generic Ethernet Access - Fibre To The Cabinet (GEA - FTTC) Simultaneous Provide wholesale offer, which would allow BT (i.e. Openreach) to extend the existing offer in advance of the normal 90 days' written notice period. We invited comments on BT's request and our proposal by 11 September 2012. This document sets out our decision to agree to BT's request and contains the formal Consent to do so set out at Annex 1.
- 1.2 Significant Market Power (SMP) services condition FAA6 - Requirement to notify charges and terms and conditions ('Condition FAA6') was imposed on BT by Ofcom's 2010 statement *Review of the Wholesale Local Access Market - Statement*² published in October 2010. In particular, Condition FAA6.2 requires BT to give not less than 90 days' notice of any amendment to the charges, terms and conditions for existing Network Access, before any such amendment comes into effect. The GEA-FTTC service which is the subject of BT's request is subject to that SMP Condition.
- 1.3 In the remainder of this document we refer to Openreach instead of BT, as this is the operating division within BT responsible for supplying FTTC wholesale products.
- 1.4 On 22 August 2012, Openreach requested that Ofcom consent to a waiver of the notification period referred to above to enable it to give effect to a price change earlier than 90 days. On the same date Openreach published the document titled "NGA023/12 Proposed extension of GEA-FTTC simultaneous provide special offer"³ which sets out details of the offer and Access Charge Change Notice ('ACCN OR264 Revised').⁴
- 1.5 The document "NGA023/12 Proposed extension of GEA-FTTC simultaneous provide special offer" sets out the details of Openreach's offer to its wholesale customers. The scheme consists of a £50 discount to the FTTC connection price (£80) where FTTC is ordered together with either a) a new provide for Wholesale Line Rental (WLR) or MPF (Metallic Path Facility) or b) a request to start a line previously stopped for more than 90 days. The FTTC Simultaneous Provide offer is currently available to Communication Providers (CPs) from Openreach on a national basis and will end on 30 September 2012. The current offer also applies to FTTP connections

¹ <http://stakeholders.ofcom.org.uk/binaries/consultations/bt-fttc/summary/condoc.pdf>

² http://stakeholders.ofcom.org.uk/binaries/consultations/wla/statement/WLA_statement.pdf

³ <http://www.openreach.co.uk/orpg/home/updates/briefings/super-fastfibreaccessbriefings/super-fastfibreaccessbriefingsarticles/nga02312.do>

⁴ <http://www.openreach.co.uk/orpg/home/products/pricing/notificationDetails.do?data=ThQLPOgdo8c%2FpcQINXj7BV0AzMfOClw%2B7d4ELMHNgDcoiUHCRZvKBvza4ozCo5emlmbMkfEWV9Hg%0AS5od5xPk5mMrG2JXeytL6pFJZpTLM42nMTEF%2BKjWmexJt5mYlgMVVCBTHUk%2FAkGGPXhiPyurwQ%3D%3D>

at Brownfield sites but Openreach has not requested to extend the FTTP element of the offer beyond 30 September 2012 as it has attracted very low volumes.

- 1.6 Openreach intends to extend the FTTC Simultaneous Provide offer for two additional months (from 1 October to 30 November 2012) but limit it to specific geographic areas, i.e. large areas of London and North West England excluding Cumbria (the proposed list of Local Exchanges entitled to the offer is at Annex 3). As Openreach has not provided 90 days notice of its intention to extend the offer, the two month extension would require Ofcom to agree to waive the 90 day notice period contained in SMP condition FAA6.
- 1.7 Openreach had advised us that the proposal to extend the price reductions earlier had already been presented to relevant industry stakeholders. Openreach also advised that it had received no objections to its proposed offer but rather support from those Communication Providers (CPs) who were currently considering increasing their consumption of FTTC wholesale lines, e.g. Sky.
- 1.8 Openreach considers that the terms of the price change require 90 days' written notice in accordance with SMP services condition FAA6.2. However, Openreach wished to bring forward the date on which the price reduction applies to 1 October 2012. Under SMP condition FAA6.1, Ofcom may consent in writing to Openreach publishing charges, terms and conditions in a manner different to that provided for in condition FAA6.2 where it considers it appropriate to do so. This would include a waiver of the requirement to provide 90 days' written notice.

Openreach wishes to bring forward the Offer Period

- 1.9 Openreach has explained that it wishes to extend its current GEA-FTTC Simultaneous Provide offer which reduces the connection price of a new line by £50, meaning that the total connection price is brought down from £80 to £30 during the offer period. The discount would only apply when FTTC is ordered together with either a) a new provide of WLR or MPF or b) a request to start WLR/MPF lines which have previously been stopped for more than 90 days.
- 1.10 The offer will be available to all CPs that purchase FTTC and either WLR or MPF and no registration process is required. CPs will be rebated monthly at a £50 per FTTC line that is covered by the terms of the offer.
- 1.11 In addition, Openreach wishes to modify the current FTTC offer which applies at a national level and limit it to specific geographic areas identified by a list of local exchanges (see Annex 3). The areas include large parts of London and North West of England excluding Cumbria.
- 1.12 Openreach has advised us that the price discount would target specific locations in order to meet its wholesale customers' demand whilst ensuring that Openreach's overall service delivery is not impacted. The targeted areas are currently characterised by satisfactory performance levels, therefore the offer extension is unlikely to disrupt or delay the provision and fault repair of other Openreach wholesale services. Openreach has further explained that, considering volumes from 1 April 2012 (when the national offer started) to date, FTTC connections which have benefited from the price discount represent 5% of FTTC total volumes. By extending the offer by two months, Openreach expects FTTC Simultaneous Provide orders to rise to around 6% of total FTTC volumes for the months of October and November.

The September 2012 Waiver Consultation

- 1.13 In the September 2012 Waiver Consultation we explained that we considered the shortening of the notice period from 90 to 40 days would be likely to bring forward any benefits of the scheme to wholesale purchasers of FTTC services and possibly to end users, if price reductions were passed on to consumers. We noted that the shorter notification period could be useful to CPs, as it would allow them to continue to benefit from the existing offer. We therefore proposed granting consent in this case to enable Openreach to extend the offer.
- 1.14 We sought comments on the proposal to waive the notification period by 11 September 2012.

Respondents' views

- 1.15 We received 3 responses to the September 2012 Waiver Consultation and an expression of support from one CP in advance of the consultation. A list of the respondents is at Annex 2.
- 1.16 Sky expressed support for the granting of the notification waiver in advance of the consultation.
- 1.17 In its response, Talktalk supported the granting of the notification waiver.
- 1.18 BT's response expressed support for the notification waiver. BT said that it did not believe the extension of this offer will have a significant impact on the market but that it would provide a platform for CPs to further test the market, and as such will be an important step towards stimulating greater competition in the market for the provision of superfast broadband services, which it considered likely to be beneficial to end users.
- 1.19 Virgin Media considered that it offered a different perspective, not being a wholesale customer for FTTC GEA products, but offering competing products in the retail market.
- 1.20 Virgin Media considered that Ofcom needed to have full regard to the reasons why the obligation to notify prices in advance was imposed on BT. It highlighted that Condition FAA6 was imposed on BT following a determination that the company held SMP in the relevant market. It noted that prior notification of changes to charges is important to ensure that competing providers have sufficient time to plan for such changes, as they may want to restructure the prices of their downstream offerings in response to charge changes at the wholesale level. It was also noted that price notification helps market stability and creates an environment which is more likely to encourage investment.
- 1.21 Virgin Media stated that the period for which the consent is sought is not insignificant, in that it covers the start of the university academic year, which typically results in increased broadband take up, and which is factored into CP's plans and market campaigns. Therefore, VM consider that there is a potential need to assess and react to the effect of this discount on retail offerings by both BT Retail and those CPs who are BT's wholesale customers.
- 1.22 Virgin Media indicated that it is important to consider the impact of the proposal on competing network providers who do not need to purchase the relevant wholesale inputs and ultimately compete in the retail space.

- 1.23 Virgin Media also consider that there were sound reasons for imposing the 90 day notification period, as set out in the Wholesale Line Access (WLA) Market Review. Consent to depart from this obligation should be considered on an exceptional basis; Virgin Media would, for example, be concerned if a further application to waive the notice period was made to allow for an extension beyond November.

Our response

- 1.24 We have considered all of the responses provided to the September 2012 Waiver Consultation.
- 1.25 It is important to note that Ofcom is not consulting on the contents of the offer itself but on Openreach's request to bring forward the offer from 90 days to 40 days. In granting the consent in this document, we make no comment on the compatibility of the substance of the offer with the relevant regulation.
- 1.26 In relation to the point made by Virgin Media regarding extension of the offer past November, our consent is limited to a waiver of the notification period in respect of the proposed extension of the offer and any further extension would need to comply with the 90 day notification requirement.
- 1.27 Virgin Media highlights that 90 days was considered the minimum period necessary to allow competing providers to plan for changes to existing network access. Given that the offer has been in place since 1 April 2012, that the original offer was notified in accordance with the applicable regulation and that the exemption request relates to the extension of the existing offer, we consider that any impact on wholesale or retail providers is likely to be minimal.
- 1.28 In response to Virgin Media's comments in relation to the part played by price notification in assisting market stability and encouragement of investment, we recognise this concern in a situation where systematic price changes are being made at short notice. Substantial infrastructure investment has already been made by both BT and Virgin Media in the geographic areas covered by the extended offer and therefore competing services are already available from both operators. Given the relatively short period of time for which the offer will be extended and the relatively small additional volumes that Openreach is forecasting that it will sell, we do not consider the reduction in the notification period will have a chilling effect on investment.
- 1.29 In relation to Virgin Media's concerns of the impact of the proposed waiver on competing network providers and ultimately competition at the retail level, we do not consider that the impact is likely to be significant. This is because of the limited length of time that the offer will be extended i.e. 2 months, the relatively small additional volume of GEA-FTTC products that Openreach has advised us that it is forecast to sell, and the more limited geography where the offer is available in comparison to the existing offer.
- 1.30 We note that the timing of the extension of the offer covers the start of the academic year. However, based on the geographic limitation of the offer combined with the relatively small additional volume of GEA-FTTC products that Openreach has advised us that is forecast to sell, we consider that the timing of the offer is not significant.

Statutory requirements to be met before giving a consent

- 1.31 Section 49 of the Act applies where Ofcom proposes to grant a consent which affects the operation of a condition made under section 45 of the Act (including SMP services conditions). In order to give such consent, Ofcom must first satisfy itself that the criteria set out in section 49(2) are satisfied, namely that the giving of a consent:
- i) is objectively justifiable in relation to the networks, services, facilities, apparatus or directories to which it relates;
 - ii) is not such as to discriminate unduly against particular persons or against a particular description of persons;
 - iii) is proportionate to what it is intended to achieve; and
 - iv) is transparent, in relation to what it is intended to achieve.
- 1.32 Openreach submitted a letter to Ofcom on 22 August 2012 in which Openreach's views on the legal and regulatory basis for the request are set out.
- 1.33 We consider that the criteria set out in section 49(2) of the Act are satisfied for the following reasons and therefore consider that we should grant the consent to a shorter notice period in this case.

The waiver is objectively justifiable

- 1.34 Openreach believes that the price reduction will be beneficial to wholesale purchasers of GEA-FTTC services and that it is also likely to be of benefit to end users. Openreach has stated that the offer is constructed in such a way as to be of benefit to all of its CP customers regardless of their size. Openreach explained that it would like to bring the benefits of the extended offer period to its customers at the earliest possible opportunity, and considers that a 40 day notification period would enable CPs to continue to benefit from the price reductions.
- 1.35 We consider that granting a consent to a shorter notice period in this case is objectively justifiable since this would enable any benefits to continue to be experienced by CPs and also potentially by end-users to the extent that the reduction in charges is passed on to them.

The waiver is not unduly discriminatory

- 1.36 We do not consider that the granting of a consent to a shorter notice period in this case would discriminate unduly against particular persons or against a particular description of persons. Openreach consider that this scheme meets the non-discriminatory SMP condition for its local access services in that:
- It is available to all CPs purchasing FTTC services a) with a new provide of WLR or MPF or b) to start WLR/MPF stopped lines which have been stopped for more than 90 days.
 - It is intended to be beneficial to all CPs, irrespective of size.
- 1.37 Ofcom notes that SMP condition FAA3 imposes obligations on Openreach not to unduly discriminate in the provision of wholesale local access services, and that undue discrimination would exist if Openreach unfairly favoured to a material extent

BT's downstream activities so as to place other CPs at a competitive disadvantage. In considering Openreach's request to shorten the notice period for the proposed price changes, Ofcom has not reached any conclusion on whether or not the changes themselves would be discriminatory. Should it appear necessary to consider the substance of the offer in greater detail, in particular in light of any complaints, Ofcom retains the right to investigate compliance with the requirements not to discriminate contained in SMP condition FAA3. We note in this respect Openreach's submission that the geographic limitations of the offer reflect the need to meet CPs' demand without impacting on Openreach service delivery but make no further comment.

- 1.38 We have considered the situation where owners of alternative infrastructure who compete with GEA-FTTC services at the retail level i.e. Virgin Media, might be the subject of discrimination due to the shortening of the notice period. However, we do not consider that the granting of consent to the shortening of the notice period for price changes in this case, would be unduly discriminatory against such providers, since any impact would be limited in scope and time.

The waiver is proportionate

- 1.39 We believe that our consent to shorten the notice period is proportionate in this case. Our proposal was intended to ensure that any benefits of the offer to wholesale purchasers of GEA-FTTC services and to end users could be extended. In particular, we noted that the shorter notification period could be of use to CPs that want to further promote superfast broadband services.
- 1.40 We consider that the shorter notification period will not cause any material disadvantage to CPs and that there are no less restrictive measures which would achieve this aim. We are therefore satisfied that our decision to grant a waiver in this case is proportionate to the objective it is intended to achieve.

The consent to waive the 90 day notice period is transparent in relation to what it is intended to achieve

- 1.41 This statement sets out why we are intending to grant a consent in this case and the relevant documents pertaining to Openreach's proposal were annexed to the September 2012 Waiver Consultation document. We therefore consider that the proposed consent to waive the 90 day notification requirement is transparent in what it is intended to achieve.

The waiver is consistent with Ofcom's general duties

- 1.42 We consider that the granting of this consent would be consistent with Ofcom's obligations under section 3 and 4 of the Communications Act in that it would further the interests of consumers and encourage retail competition by extending the existing offer.

Ofcom has consulted on its proposals

- 1.43 Section 49A of the Act obliges Ofcom to publish a notification whenever it proposes to give a consent for the purposes of a SMP condition set under section 45 of the Act where that proposal would, in Ofcom's opinion, have a significant impact on a market for any of the services, facilities, apparatus or directories in relation to which Ofcom has functions under Part 2 Chapter 1 of the Act. As set out above, we do not consider that the offer extension of GEA-FTTC Simultaneous Provide will have a

substantial impact on the market. However, before granting our consent we sought stakeholders' views on the potential impact that this price notification waiver would have on the market and ultimately consumers.

- 1.44 On the basis that this price change is limited geographically and only applies to simultaneous provide of FTTC and WLR/MPF, we indicated in the consultation that it was unclear to us whether the impact on the market would be particularly significant. Openreach's forecast of incremental lines generated by the offer is quite limited (from 5% to 6%). However, we recognised that the offer extension could contribute to accelerate wholesale providers' shift from current generation to next generation broadband, hence increasing consumers' adoption of superfast broadband. Ofcom received no indication in responses to the consultation that the impact of the consent to a waiver of the 90 day requirement would be significant.
- 1.45 The September 2012 Waiver Consultation explained the basis upon which we were consulting and constituted a notification under section 49A(3) of the Act.
- 1.46 We also explained the effect of section 49A(7) of the Act, which provides that a proposal does not need to be notified to the European Commission, BEREC and other Member States' regulatory authorities before it is given effect, if the proposal is not of 'EU significance'. We explained that we did not consider the proposal to be of EU significance because, in our opinion, it would not affect trade between Member States. We remain of that view.
- 1.47 We have therefore decided to consent to waive the relevant price notification requirement in this case. The consent under SMP service condition FAA6.2 is published at Annex 1 of this document and is effective from the date of publication of this Statement.

Annex 1

Consent under SMP service condition FAA6.2

Consent pursuant to SMP services condition FAA6 imposed on BT as a result of the analysis of wholesale local access market in which BT has been found to have significant market power

BACKGROUND:

1. As a result of a market analysis carried out by OFCOM, OFCOM issued a Statement on 7 October 2010 in accordance with section 79 of the Act that BT has significant market power in the market for wholesale local access services in the UK except the Hull area and imposed certain SMP services conditions on BT, including Condition FAA6;
2. This Consent concerns matters to which Condition FAA6 relates;
3. For the reasons set out in the Explanatory Statement accompanying this Consent, OFCOM is satisfied that, in accordance with Section 49(2) of the Act, this Consent is:
 - (a) objectively justifiable in relation to the networks, services, facilities, apparatus or directories to which it relates;
 - (b) not such as to discriminate unduly against particular persons or against a particular description of persons;
 - (c) proportionate to what it is intended to achieve; and
 - (d) in relation to what it is intended to achieve, transparent.
4. For the reasons set out in the Explanatory Statement accompanying this Consent, OFCOM is satisfied that it has acted in accordance with the relevant duties set out in sections 3 and 4 of the Act;
5. On 4 September 2012, OFCOM published a notification of the proposed Consent in accordance with section 49A of the Act;
6. OFCOM has considered every representation about the proposed Consent duly made to it; and

CONSENT

NOW, therefore, in accordance with section 49 of the Act and pursuant to Condition FAA6, OFCOM gives the following Consent:

7. For the purposes of complying with its obligations under Condition FAA6.2, OFCOM consents that BT shall not be obliged to give 90 days' notice in respect of the proposed price changes set out in Access Charge Change Notice OR264 Revised issued on 22 August 2012 which relates to the Special Offer (Simultaneous Provide) Generic Ethernet Access – Fibre to the Cabinet.

8. For the purposes of interpreting this Consent, the following definitions shall apply:
 - (a) **“Act”** means the Communications Act 2003
 - (b) **“BT”** means British Telecommunications plc, whose registered company number is 1800000, and any of its subsidiaries or holding companies, or any subsidiary of such holding companies, all as defined by section 1159 of the Companies Act 2006; and
 - (c) **“OFCOM”** means the Office of Communications.
9. Except insofar as the context otherwise requires, words or expressions shall have the meaning assigned to them in paragraph 2 above.
10. For the purpose of interpreting this Consent:
 - (a) headings and titles shall be disregarded; and
 - (b) the Interpretation Act 1978 shall apply as if this Consent were an Act of Parliament.
11. This Consent shall take effect on the day it is published.

Marina Gibbs
Competition Policy Director

A person duly authorised in accordance with paragraph 18 of the Schedule to the Office of Communications Act 2002

21 September 2012

Annex 2

List of respondents to consultation

A2.1 We received 3 responses from the following Communication Providers:

- BT
- Virgin Media
- Talktalk

Annex 3

List of Local Exchanges subject to the proposed offer

Exchange Name

Accrington	Ealing	Lytham	Shepherds Bush
Acton	Earby	Macclesfield	Shoreditch
Adlington	Earls Court	Maghull	Simonswood
Ainsdale	East	Maida Vale	Skelmersdale
Aintree	Eastham	Manley	Skyport
Albert Dock	Eccles	Manor Park	Slaidburn
Alderley Edge	Eccleston	Marple	Sloane
Allerton	Edgware	Marshalls Cross	Soho Aka Gerrard St
Altrincham	Egham	Marton	South Harrow
Anfield	Ellesmere Port	Marton Heath	South Kensington
Appley Bridge	Elstree	Marylebone	South Shore
Ardwick	Euston	Mayfair	Southall
Arley	Failsworth	Mellor	Southbank
Arrowebrook	Faraday	Mercury	Southport
Ashford	Farnworth	Middleton	Southwark
Ashton	Feltham	Middlewich	St Annes
Ashton In Makerfield	Finchley	Mile End	St Michaels
Ashton On Ribble	Fleet	Mill Hill	St Pauls
Aspull	Fleetwood	Mobberley	Staines
Astley Bridge	Formby	Monument	Stalybridge
Atherton	Freckleton	Moore	Stamford Hill
Aughton Green	Frodsham	Moorgate	Standish
Bacup	Fulham	Moss Side	Stanley
Bamber Bridge	Fulwood	Mossley	Stanmore
Barnoldswick	Garstang	Mottram	Stepney Green
Battersea	Garston	Mountwood	Stepping Hill
Bayswater	Gateacre	Muswell Hill	Stockport
Belgravia	Gatley	Nelson	Stockton Heath
Belmont	Gisburn	Neston	Stoneycroft
Bermondsey	Glossop	Netherley	Stonyhurst
Billinge	Golders Green	New Cross	Stratford
Birkdale	Great Crosby	New Mills	Sutton
Birkenhead	Great Eccleston	New Southgate	Swinton
Bishopsgate	Great Harwood	Newton-Le-Willows	Taddington
Blackburn	Greenford	Nine Elms	Telephone Buildings York
Blackfriars	Hackney	Norcott Brook	Tideswell

Blackpool	Hale	North	Todmorden
Bloomsbury Aka Howland St	Halsall	North Edgware	Tottenham
Bollington	Hambleton	North Finchley	Tottington
Bolton	Hammersmith	North Paddington	Trafford
Bolton By Bowland	Hampstead	North Rode	Turton
Bootle	Harefield	North Shore	Twickenham
Bowes Park	Harlesden	North Wembley	Upholland
Bramhall	Harrow	Northolt	Upper Holloway
Brinscall	Hartford	Northwich	Upton Park
Brixton	Hartington	Northwood	Urmston
Brock	Hatch End	Oldham	Uxbridge
Bromborough	Hayes North	Ormskirk	Vauxhall
Broughton - Manchester	Heaton Moor	Orrell	Walkden
Broughton - WLancs	Helsby	Paddington	Wallasey
Bucklow Hill	Hendon	Padgate	Walthamstow
Burnley	Hesketh Bank	Padgate Park	Walworth
Burscough	Heswall	Padiham	Wanstead
Bury	Heywood	Parbold	Wapping
Bushey Heath	Highams Park	Parsons Green	Warrington
Buxton	Higher Bolton	Pendleton	Waterloo
Caldy	Hightown	Penketh	Watford
Canary Wharf	Hindley	Penwortham	Weaverham
Canonbury	Hoghton	Perivale	Weeton
Catforth	Holborn	Pickmere	Wembley
Chapel-En-Le-Frith	Hooton	Pilling	West Drayton
Chatburn	Horwich	Pimlico	West Kensington
Cheetham Hill	Hounslow	Pinner	Westhoughton
Chelford	Hoylake	Platt Bridge	Westminster
Chelsea	Hulme Hall	Pleasington	Westwood
Childwall	Hunts Cross	Poplar	Whaley Bridge
Chinley	Huyton	Poulton-Le-Fylde	Whalley
Chipping	Hyde	Poynton	Whitefield
Chiswick	Irby	Prescot	Whitehall
Chorley	Irlam	Prestbury	Whitworth
Chorleywood	Isleworth	Preston	Widnes
Chorlton	Kensal Green	Prestwich	Wigan
Churchtown	Kensington Gardens	Primrose Hill	Willesden
Clapton	Kentish Town	Radcliffe	Wilmslow
Cloughton	Kenton Road	Radlett	Wilpshire
Clerkenwell	Kings Cross	Rainford	Windle
Cleveleys	Kings Langley	Ramsbottom	Winsford
Clitheroe	Kingsbury	Ribbleton	Wood Green
Colindale	Kingsland Green	Ribchester	Wood Street
Collyhurst	Kingsley	Rickmansworth	Woodley
Colne	Kirkham	Ringway	Wraysbury
Comberbach	Kneller Hall	Rochdale	Wythenshawe

Congleton	Knott End	Rock Ferry
Coppull	Knutsford	Rossendale
Covent Garden	Lancaster House ATE	Royal
Cressington	Lark Lane	Rufford
Cricklewood	Layton	Ruislip
Croston	Leigh	Runcorn East
Crouch End	Leyland	Runcorn Main
Culcheth	Leytonstone	Rusholme
Darwen	Littleborough	Rushton Spencer
Daubhill	Longford	Saddleworth
Denham	Longnor	Saint Helens
Denton	Longridge	Sale
Didsbury	Longton	Samlesbury
Disley	Lords	Sandiway
Docklands Zone Two	Lower Holloway	Scarisbrick
Droylsden	Lower Peover	Sefton Park
Dunsop Bridge	Lymm	Shaw