Telephony Services Ltd
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Ofcom   30th August 2012
FAO: Matina Papadopoulou,
Competition Group,
4th Floor,
Riverside House
2A Southwark Bridge South
London SE1 9HA

Reference the Business Market review and the Leased Lines Charge Control consultation.

Dear Matina,

TSL would wish to submit the following response to the Business Market review and the Leased Lines Charge Control consultation.

In essences TSL support the proposals of the review and subsequent consultation.

Both TSL and associated companies (aq ltd and Gradwell) work predominately in the IP market and all initiatives which support further growth and competition in this area are welcomed.

Ofcom's overall approach and recognition that in many areas the market definitions as defined in 2007/8 has changed, supports how we are seeing our market sector develop. Our particular interest is that of the alternative interfaces (AI) and Ethernet.

We agree that this is a growing market and with the view Ofcom have taken with respect to recognising the need to address both the access and backhaul elements of the AISBO and CP's ability to purchase these elements of network on an equivalent bases, which will allow cost effective network deployment. We further welcome Ofcom providing clarity of BT's obligations and requirements in the area.

Ofcom, with other bodies[1], recognise the growing market for IP products and services. The IEEE's recent report states that IP traffic is expected to grow year on year by 30% to 40%, supports Ofcom's conclusions. Aql, Gradwell and TSL are primarily interested in the continued growth of VoIP especially and believe Ofcom's recognition that the easier access of supply to Ethernet products supports this market segment.

We especially welcome the forward thinking proposal of RPI-12% on the Ethernet products fostering certain in this area of growth.

Regards,

Alexandra Jennings
On Behalf of TSL / Gradwell / AQL

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[1]IEEE 802.3 Ethernet Working Group Communication, published July 19th 2012

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