Stakeholder queries on Ofcom's consultation of 31 March 2011 on charge control review for LLU and WLR services

Further questions and answers

Condoc. ref.	Stakeholder query	Ofcom response	Follow up stakeholder question	Follow up and/or further Ofcom response
CA for Publish (empty) model Cost_Assumptions worksheet	What methodology is OOI income assigned (See row 86 in mode)?	This is a static methodology, the only dynamic methodologies are labour driven. Stakeholders are invited to suggest which dynamic KMHs would be appropriate as a basis of cost allocation		
CA for Publish (empty) model Cost_Assumptions worksheet	What methodology type is agency-sourced labour assigned to (see row 90 in model)?	This is a static methodology, the only dynamic methodologies are labour driven. Stakeholders are invited to suggest which dynamic KMHs would be appropriate as a basis of cost allocation		
CA for Publish (empty) model	What	This refers to service		

Cost_Assumptions worksheet	methodology type is labour and other operating costs from service desk activities assigned to (see 100-101 in model)?	design (i.e. network planning)This is a static methodology, the only dynamic methodologies are labour driven. Stakeholders are invited to suggest which dynamic KMHs would be appropriate as a basis of cost allocation		
CA for Publish (empty) model Cost_Assumptions worksheet	What methodology type is cost of sales assigned to (see row 11 to 21 (and rows 152-161 in model)?	Cost of sales, such as line cards represent the depreciation and associated overheads on assets operated by BT Operate. This is a static methodology, the only dynamic methodologies are labour driven. Stakeholders are invited to suggest which dynamic KMHs would be appropriate as a basis of cost allocation		
CA for Publish (empty) model Cost_Assumptions worksheet	What type of dynamic methodology type is agency-sourced labour assigned to (see Rows 162, 165 - 169, 171 – 176 in model)?	Rows 106 downwards are not used.		

CA for Publish (empty) model	Activity_Allocations worksheet	Why are KMH/product volume current inputs are all hard-coded?	In the empty model they are hardcoded to ensure the allocation % = 100	
CA for Publish (empty) model	Cost_Assumptions worksheet	What is C202 methodology (see rows 85 and 86 of model)?	C202 is a specific type of income that needs to be allocated on a different basis.	
113-114 (Annexes)	A7.129 / Fig. 7.21	Please explain how you have calculated the unit cost assumption (£2.37) shown in figure 7.21?	The cost is spread over WLR basic and premium volumes.	
CA for Publish	Product_metrics	Can Ofcom explain what this balancing item in the 'product metrics ' sheet is?	Other operating Income.	
A81 - A87	§A9.15 et seq	Can you explain any differences between cost trends in 2013/14 and figures presented?	Generally the "Other (inc. NGA)"'spike' occurs in 2012/13 bringing down costs in that year but reversing out in 2013/14 causing some costs to rise.	
		Is / where is the pool of staff who are between roles in BTs redundancy scheme - this	The way we calculate efficiency/redundancy does not take account of the this pool of staff. We do not think that this cost is	The costs of the Openreach individuals in the BT Transition Centre ("BTTC") continue to be incurred in the

	cost included in the costs for the regulated products and how much is the cost?	included in the Ops Non KMH driven pay. We are gathering our final response for this and will update when available		original business unit in which the individual was based prior to being moved to the BTTC. If the individual is subsequently seconded to another role then their costs will be re-directed to that area but once the secondment ends the costs will again be incurred in the original business unit. If the move from the BTTC is permanent, costs from the date of transfer will be incurred in the individual's new business unit. The 2010/11 loaded costs for Openreach employees within the BTTC were not material. (Loaded costs in includes salary, NI, benefits/overtime allowance, bonus and pensions costs. As noted already our model does not

				include the cost of Openreach redeployees in the BTTC given that any excess labour, driven through volume dynamics and incremental efficiencies, is assumed to exit the business.
	Does Ofcom know the reason for MPF cease costs to be so much higher than SMPF cease costs (Fig 4.9)	MPF costs have a higher proportion of Service Management Costs (SMCs) costs than SMPF		
	In what cost category are tie cable cost arise (in e.g. Annex Fig 8.12) [these are the tie cables that are included as part of the rental charges]	Tie cables are an asset cost that are included within E side copper. The driver for Capex are new POPs and Tie cable installs. These drive a complex KMH category (LLU-F554) which forms part of the LLU Capex category. This Capex category is included within the E Side Copper and Duct asset.		

	(TTG80) the annual target referred to in §A7.38 is this a cost saving target or an efficiency gain target	This was described to us as an efficiency target		
	Can you give historic efficiency numbers one decimal place.	To one decimal place, the numbers are 4.0% and 9.0%. Both are rounded up, so the average is below 6.5%.		
	(TTG82) are efficiency figures given for NERA, Wyman, historic, MTP net efficiency gains or gross efficiency gains?	The Wyman and NERA figures are based on benchmarking studies, but probably equate most closely to gross numbers. The historical efficiency savings numbers are estimated before implementation costs, so should probably be considered to be gross numbers. We understand that the MTP targets are based on cash movements that include implementation costs, so might therefore be considered to be net numbers.		
	(TTG88) is the	Fig 8.9 is on a 'Cost	the answer you	No, 8.9 is the same

| | | computing cost in Fig 8.10, Fig 9.3, Fig 9.5 the same computing cost as in Fig 8.9? | Heading' basis and is consistent with 8.10. These costs are allocated (along with other costs) using the Net Development basis (see CA for publish (Empty) tab 'Cost_Assumptions) Figure 9.3 and 9.5 are on a 'Activity bases', the 'Activity_Allocations' tab of the CA for publish model shows that 'Computing LLU' picks up a share of the costs allocated on the DEPN DEVELOPMENT basis (as well as costs on the AS&M BASE basis) but these costs are also allocated to other activities. | provide does not answer or explain the anomaly | as 8.10, 9.3 is the same as 9.5. 8.9 and 8.10 are aggregate computing costs, some of which is allocated to the specific activity 'Computing LLU' set out in 9.3 and 9.5 |
| A40 | A Fig 6.1 | We would like documentation on the mapping of product categories between Ofcom's Cost Forecast model, and the BT RFS. | | | See attachment 'AM 22 tab' in 'data in attachment 1' |

A71	§A8.131	Would it be possible to obtain a summary of the said BT Local Line Costing Study?			See 'Word Doc AM28'
annex 55-57, 66	A8.27 to A8.39, A8.88 to A8.92	What kind of data or model has been provided to Ofcom to assess the impact of the change of product volumes mix on Cumulo? How is the allocation methodology consistent with the RFS and the allocation rule "net replacement cost value weighted by the level of profit generated by the assets"?	Openreach expects the VOA process will be completed by end August. Based on discussions with the VOA to date, Openreach considers that the forecasts provided to Ofcom last August remain valid.		BT Cumulo Rates for Ofcom Non Confidentia
A40	A6.7	Does the sum of Ofcom's MPF New Provide, Single Migrations and Mass Migrations figure for 2009/10 map onto the RFS figure for MPF	The volumes were drawn from Openreach volume records which also informed the RFS. We note the is a 200k difference which will form part of our final reconciliation work.	TTG asked can Ofcom explain this discrepancy. How did it / can it arise?	See 'detailed mapping tab' in 'data attachment 1'

		connections?			
CA for Publish	Product_metrics	In sheet "Product_Metrics" in the CA model, the unit operating costs have been broken down by activity type – see the list of activity types below: a. NBB b. FSP&I c. BTW charge d. Frame provision e. Frame repair f. Field provision g. Field repair h. SMC i. Other Please explain what activities are include in each type.	The 'Activity type' descriptions were carried over from the previous model. Neither Ofcom, nor we believe BT now uses this mapping. For reference NBB = Network Building Block (depn of network assets by products), FSP&I = Field Service Planning and Investment (other depn and overheads), BTW = BT Wholesale (cost of sales from BT operate), Frame provision (connection/migration on frame), Frame Repair (Operations resource on Frame repairs), Field provision (provisioning activities on network), Field Repair (repair activities on network), SMC = Service Management Centre (call centres and support	TTG asked re. FE10: can Ofcom explain exactly what type of activities / costs are included in each of: NBB, FSP&I, costs of sales from BTO, support engineering tasks	See 'FE10 Tab' in 'data attachment 1'. As noted previously these are out of date cost descriptions that we do not use.

			engineering tasks)., Other (mainly product facing functions such as sales and product management and systems and development.		
pg25	3.3	Could Ofcom provide details of the treatment of NGA activities within the model including a description of what NGA related costs and revenues are included in the model and: • how access duct costs have been allocated between NGA products and existing products; • how the allocation of any fixed and common costs have been allocated between NGA and existing products; • how labour costs and other operational costs	NGA allocation (FE4, TTG 39) supplementary information published on 29 June 2011	TTG - the answer provided on the tab does not answer the question posed	A) and b) . The Cost_Assumptions sheet sets out the Methodology by which Duct costs are allocated. Activity_Allocations then shows for non confidential allocations how Duct cost is allocated to 'Activities' There is no 'NGA' activity. The final step is the 'Product_Allocations' shows the allocations to all products including NGA (which has been redacted). Fixed and Common costs follow the same process. c) NGA labour costs, which relate mainly to provisioning have been estimated by BT on a global basis

		related to NGA activities have been projected and allocated to services, given the limited operational experience of operating and maintaining these products.			(e.g. total KMH for FFTC Provisioning) avoiding the need for detailed bottom up operational information.
RAV for Publish	'Copper_HCA_Depreciation' and 'Duct_HCA_Depreciation'	Can you explain the treatment of asset lives before, within and after the 2005 copper statement?	The RAV model writes off assets at 18 years and 40 years from 2006/7 onwards. All new assets are on a straight line. For old assets the model calculates pre the 2006/7 depreciation as it happened i.e. using the various previous methods in the accounts– Forecast future deprecation based on writing off the remaining asset balances straight line over the remaining asset lives based on either 18 or 40 years. This has been the treatment of the RAV since 2005 and we understand the intent		

			of the review, however, we accept that the 2005 statement wording is not clear on this point.		
62 (annexes)	Figure 8.10	Which cost categories make up the "Others" cost category shown in figure 8.10 in Annex 8 of the consultation document?	Openreach does not consent to the disclosure at the level suggested by Ofcom and has therefore requested that Ofcom resubmits its proposed response for Openreach to review.	TTG- explanation of what is in other	We are unable to provide a further breakdown due to confidentiality.
A58	§A8.41	Can Ofcom provide a list of the largest 20 cost categories in Group HQ and a brief description of what each of these is?	We are checking on confidentiality and will update with our final response as soon as possible	TTG- need a breakdown of the Group HQ sub-cost categories	See 'TG11 Corp Overheads tab' in 'data attachment 1' for top 6 headings.
A73	A8.144	Why more (repaired) d-side and e-side faults on MPF than WLR?	Based on actual number of faults repaired, we are investigating why.		See 'TTG23 tab' in 'data attachment 1'
A77	Fig 8.25	Why does MPF have >2.00 times forecast repairs than WLR when it	Based on actual number of faults repaired, we are investigating why.	TTG - Explanation of apparent anomalies in	We believe the actual fault rate incidence is slightly higher for MPF as

		only uses twice the frame? Similarly, why is SMPF <1.00?		fault rates for MPF vs. WLR	there are more potential points of failure on MPF compared with WLR]
A86	Fig 9.17, 9.18	Why, if MPF has lower service centre costs, does it not have lower fault repair costs?	Base year KMHs on engineering functions and SMC are separately calculated and may not necessarily be correlated with Ops KMHs. We are gathering our response for this and will update when available	Explanation of apparent anomalies in fault rates for MPF vs. WLR	BT have informed us that the SMC allocation to MPF in 2010/11 is too low and have been corrected in the RFS.
A80	Fig 9.4	Why is there zero DACS costs (since it is assumed DACS is used §A8.131)?	Not zero but very small (c£20k). There are only about 50k lines with the equipment. The equipment itself is highly depreciated.	(TTG31) - Why is this?	In our answer to TTG we said "there are only about 50k lines", we have not investigated the actual number further. Your analysis on the difference between the usage factors for D and E side Copper and duct between WLR and MPF has highlighted the need for further work in this area as Pair gain does not appear to explain

| | | | | | the full story – e.g. the usage factors for WLR Premium and Basic are the same

UPDATE on 21 September - The actual number of end-users impacted is about 200k. The rate of decline has slowed as Openreach no longer proactively removes DACs units. |
|---|---|---|---|---|---|
| A81 | Fig 9.5 | What is DSL maintenance - what activities / assets are involved? | DSL maintenance is a form of SFI called Broadband Health check and is a labour driven activity. We are investigating the appropriateness of allocating to SMPF. We are gathering our final response for this and will update when available | TTG 33 - Ofcom said it would look into this

what is DSL maintenance ? | DSL Maintenance covers the business-as-usual (BAU) maintenance on wiring between the Distribution Point (DP) and the NTE. |

54	footnote 74	Can we see this slide pack or can the relevant statement (Referenced in pg 54, footnote 74 of Condoc) be revealed?			 Ancillary Baskets - slide 2 - 11.10.10.pdf
62	Fig 4.8	Why is the cost of SMPF transfer less than MPF transfer?	MPF has a higher usage factor on Service Centre - Provision for LLU as set out in published models	Q - why MPF connection cost is so much higher than the SMPF connection cost (i.e. why the service centre usage factor for MPF is so much higher) Q - • can you provide the amounts under each of the three categories – • does the WLR charge include routing and records • on MDF hardware jumpering I don't think that MPF requires more jumpering	As you point out any analysis based on the redacted and empty models is likely to be difficult. Below are some comments on the work you have done. Also attached for you assistance is an extract from our CA model which shows result of these allocations in terms of the costs that appear in the unit costs. Specific comments on your calculations: •☐ In the analysis on the "product_Analysis" worksheet, you appear to have omitted usage

| | | | than SMPF (even under double jumpering for MPF) o DJ MPF (from WLR) involves removing 1 jumper and installing 2 o WLR to WLR+SMPF involves removing 1 jumper and installing 2 (this is SMPF Provide) o WLR+SMPF(CP1) to WLR+SMPF(CP2) involves removing 2 jumper and installing 2 (this is SMPF Migration) o [SJ MPF (from WLR) involves removing 1 jumper and installing 1] • Why is there more service centre work involved in establishing an MPF line? | factors in row 49 from column AM49 onwards. Their inclusion would have produced a more accurate result, lower than the £36m calculated. However, as usage factors for a further 11 out of scope products (and more importantly the volumes of these products) have been redacted it, it is very difficult for you to produce an accurate estimate of total SMC costs.

•☐   In the sense check based on the "Cost Assumptions" tab, the largest cost' SMC labour (cell AN98) has been omitted. 9.17% of SMC labour in 2013/14 would have been allocated by the Dynamic Service Centre Base methodology to |

				A061. However as the SMC Pay is amalgamated into total pay you would be unable to calculate how more cost should have been included in activity A061.
				Markham response to A Heaney question of 6 July There are three main items which differentiate the charges for connection between MPF and SMPF:
				Routing and Records MDF Hardware Jumpering Service Centres - Provision for LLU
				Dealing with each in turn
				Routing and records – this charge applies to MPF and not SMPF as the equivalent responsibilities for the SMPF line are

				managed within WLR.
				MDF Hardware Jumpering – this is related to the configuration of the MPF connection to the MDF as you know. You have raised issues around this configuration and alternatives (single jumpering) which we consider in the preparation of the statement (and we will discuss with you more once I have a full response on the SORs from Openreach).
				Service Centres – this is simply derived from recorded work times for managing MPF and SMPF connections, there is more effort involved in the establishment of an MPF line. By all means challenge this and we are happy to pass on

					this challenge to BT. I am not sure there is much more I can offer at this stage. I would welcome your further questions and assessments in your consultation response. UPDATE 21 September - 2. WLR Connections includes Routing and Records 3. The complexity of the jumpering is factored into the task time. 4. See TTG25 answer See 'TTG 55 tab' in 'data attachment 1'
A53	Fig 8.3	What explains the large fall in accommodation cost in 2010/11?	These are based on actual (09/10) and flexed budget figure (10/11). We are investigating further the reasons for the fall.	- TTG 7 - Asked whether accommodation includes Cumulo? why accommodation cost fell	No, accommodation includes 'rent' 'facilities' and 'energy' UPDATED ANSWER 21 September - BT has improved the way it measures

				and allocates floor space accommodation
	In what cost category are tie cable cost arise (in e.g. Annex Fig 8.12) [these are the tie cables that are included as part of the rental charges]	Tie cables are an asset cost that are included within E side copper. The driver for Capex are new POPs and Tie cable installs. These drive a complex KMH category (LLU-F554) which forms part of the LLU Capex category. This Capex category is included within the E Side Copper and Duct asset.		
	On industry benchmark (Wyman) study you say that would take 5% improvement per year for three years to reach peer average. Is this to reach the current peer average or reach the peer average in 3 years time assuming that	We do not believe that there is any frontier movement reflected in these numbers, but will be following this up with Openreach.		This excludes Frontier shift

	peers improve at X% a year. In other words do these figures include catch-up only or catch-up and frontier movement?			
	(TTG85) the SMPF basket cost is higher in 10/11 and 11/12 than 09/10 even though SMPF bulk migrations and SMPF jumper removals are both lower. This would imply that SMPF reterminations have increased (since SMPF expedite is low). Can Ofcom confirm that this is the case please.	Yes, see volumes in 'Product_Assumption' tab of the CA model		
	Also the value for MPF and SMPF computing in Fig 8.10 (MPF: £2.78, SMPF: £0.59) are inconsistent with those in Figs 9.3, 9.5 (£0.70, £0.70). Can	See TTG88, the Computing cost is different from the LLU Computing activity.		

		Ofcom explain this discrepancy			
A70	Fig 8.12	What is in 'other'? It is large and large difference between WLR and MPF	Repairs on Main Distribution Frame, Service Centres, Computing, line test equipment, use of EVO Tams, Directories and Sales and product management costs. Directories is the most significant	explanation of what is in other (different bucket)	See A81 and A82 of the Condoc.
	Section 4	What is the total approximate revenue for each of SFI, TRC and electricity mark-up?	We are seeking consent to provide	Can you provide an update?	See ' TTG64 tab' in 'data attachment 1' We are seeking consent to disclose data on SFI element
		What is the correct product name for SMPF new connection?	SMPF New provide is the correct product name.		
		Do some general costs have different efficiency/inflation assumptions applied?	See published tab 'supplementary information - efficiency/inflation'		
Fig 7.7		What is the basis for selecting 0.5% of annual	No implicit assumption. Net efficiency was		

		costs as a cost reduction (see fig 7.7.)?	calculated by inputting our efficiency assumption as a gross number and recording the redundancy impact. 2. We then ran the model with no redundancy payments (i.e. net efficiency = gross) using our efficiency assumption and recoded the resultant unit costs for MPF. 3. Next hardcoded our redundancy payments from 1) in the model and flexed our efficiency assumption to arrive at the 2012/13 unit cost we calculated at 2)		
		Abortive visit charge. Where is the cost of this included? Is / how is the charge intended to be regulated?	While this cost is included in the model, we do not show this level of cost granularity, and so do not present this explicitly as a distinct item. We have not proposed to charge control this service and have not investigated,but we welcome your views and evidence in		

		consultation.		
	Why are worksheet 'Cost Assumptions', cells AA70 one column off the correct column reference?	Noted, although they refer to empty data cells in the CF model		
	Why are worksheet 'Cost Assumptions', cells P69 – 74 one column off the correct column reference?	Noted although there is no value for these inputs.		
	what drives the accomodation inflation assumption?	See Para A8.11. Accommodation is driven off of pay inflation assumption which happens to be 3%		
	Why do forecasted figures factor efficiency and inflation use a separate Cumulo inflation rate (row 77)?	See para 8.11.		
	Could we have an indication of the value of the gross up factors in c, for example for the categories	Confidentiality reasons. As noted the gross up factors are constant and we have disclosed gross Capex for the relevant		

	"final drop", "copper", "access fibre" and "LLU"?	assets.		
	Can Ofcom provide details of the calculations supporting their revised valuation of BT's duct and copper assets?.	See published RAV model		
	In assuming line length how has ofcom compared BTs view with assumptions in Broadband speeds report?	There are other factors in BB speed other than line length. The 2010 accounts show the difference in line cost (used previously as a proxy for line length) to be 3%. We expect this to fall further in 2010/11. if this is not the case we will revisit our assumption.		
	Can we have a mapping of these cost categories versus the ones in Fig 8.10.	Figure 8.10 relates to the "frames" entry in Figure 8.12. See paragraphs 8.58 to 8.61 for more details.	Q asked on 23 June - - ofcom said we would ask BT for the schedule	We consider this is confidential
	Where are WLR cease costs in the model ? How much are they / where are they allocated ?	We are happy to discuss the location of this in the model with your consultants	- regarding WLR cease and WLR jumper removal costs – I have checked with Frontier and they got no	In the CF model the KMH for ceases (row 320 of 3. Vol to KMH calc) is built up by applying the volume of products that generate WLR

| | | | sensible explanation of what has been done | ceases (1.vol) to product usage factors (2. Vol to KMH col L). This KMH is then costed up and forms part of the aggregate Direct Pay and Agency Cost. The WLR cease KMH forms part of the 'MDF Hardware jumpering' KMH. In the CA model, Direct Pay is allocated to activities on Volume Driven Pay, Agency pay is allocated straight to the MDF jumpering activity (A026). Volume driven pay to allocated on a dynamic basis to a large number of activities, with a significant proportion (c20% - see 'Activity Allocation' tab col Z) going to the MDF Jumpering Activity. MDF Jumpering is then allocated to products as per row 35 of the 'Product_Cost' tab |

| | In FAC TAM/testing costs Ofcom include all testing equipment e.g. TAMs, evoTAMs and line testing. However, in LRIC cost difference estimates Ofcom have only included the TAMs. Is there a reason for this difference in treatment? | Firstly, we would like to clarify the treatment of WLR line testing equipment in the LRIC cost difference estimates. The question says we only included the TAMs in that analysis. However, we did also include the costs of WLR specific line testing equipment in our LRIC cost difference estimates. See paragraph 8.64 in the March Consultation.

Secondly, we explain the different treatment of TAM costs and evoTAM costs and the reasons for those differences, taking TAMs first and then evoTAMs. In the CCA FAC figures, we spread the cost of TAMs over all DSL lines (see paragraphs 7.124 to 7.127, and Figure 7.21). This was on the basis that this might be appropriate on the basis of the six principles, as | | |

		we set out in our 2004 statement. From the point of view of the LRIC differentials, we are only interested in whether the cost are incremental. We do not take any other considerations into account. We considered that forward looking TAM costs were incremental to MPF and not to SMPF (see paragraphs 8.62-3). For evoTAMs, in the CCA FAC figures these costs are included in the SMPF cost stacks, and we ask whether these costs should be excluded (see paragraph 7.95-7). From the point of view of the LRIC differentials, we proposed to ignore evoTAMs because the majority of SMPF lines will not have an evoTAM and because they are charged for separately (see paragraph 8.63).		
	In setting the efficiency rate of	The range in the consultation document		

	3.5% to 5.5% what 'weight' has Ofcom given to the different data sources. Do you have a view of which of the evidence is (relatively) more relevant / reliable.	was informed by all the sources described in Annex 7. However, in deciding an appropriate range for consultation we attached relatively more weight to the historical trends and the industry benchmarking work than on the statistical analysis and CC decision. If you have views on the appropriate weight to attach to these (or other) sources in making our final decision, please set these out in your response.		
	() §A9.26 says: " [using actual faults] generates more faults than using previous methodology based on reported faults " Can Ofcom confirm that the use of actual faults only affects uage rates and not the overall forecast fault repair cost	This was confirmed at the June 23rd meeting		

	: could Ofcom explain how SLG costs (internal and external) are calculated and how much they are.	See A8.11 to A8.15 of the Condoc	A8.11 to A8.15 don't seem to provide the answer you suggest	Onlly one number calculated, based on 10/11 budget. Forcast forward using ofcom eff,cency and inflation assumption,
	Can Ofcom explain the rationale behind this approach in table below of allocating computing costs to rentals. Ofcom have suggested that some computing cost is allocated to ancillary services. Can Ofcom explain how much is allocated to these other (ancillary) services Opex/depr ROCE Total MPF £0.70 £0.47 £1.17 WLR £0.00 £0.46 £0.46 SMPF £0.70 £0.07 £0.77	the 'Cost Assumptions' tab of the CA for publish (empty) model shows that the three different types of IS expenditure are allocated on either the AS&M BASE basis or the DEPN DEVELOPMENT basis. Looking a the 'Activity_Allocations' tab of the CA for publish model, costs allocated on these basis are spread to 31 inscope activities. These activties are then allocated to products as per the 'Product_Allocations' tab of the CA for publish model. for example the Activity A078 'Computing LLU' is allocated to 16 products on an equal per volume		

		basis.		
	We have looked in the model and can only find the profitability on a group of services called 'other and NGA' (for which the ROCE in 2013/14 is 19%). Please could it disclose the revenue and cost. We cannot imagine that it is confidential since it was disclosed in 2009	There was no NGA in 2009. Disclosing 'other' would indirectly disclose the NGA information.		