

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

Theme: Line Lengths

Stakeholder	Condoc page no.	Condoc para. ref.	Stakeholder query	Ofcom response
Analysys Mason	annex 71-72	A8.130 to A8.138	Could we have further details on the methodology used to conclude that MPF and WLR lines might be of similar length on average? Ofcom also mentions that BT has provided "data" supporting their argument. Could we have disclosure of what data that is?	As discussed, the data is based on average line cost from the LLCS.
Sky	A71	§A8.131	Why is it fair to make minor adjustments to WLR to allow for DACs but not to continue with a line length adjustment?	DACs costs are a separately identifiable cost, whilst the line length adjustment was a theoretical adjustment based assumptions on the capability of copper pairs to deliver broadband. The assumptions behind the original adjustment (that broadband cannot be delivered over long line lengths) appear inconsistent with the current actual broadband penetration and copper line costs.
Talk Talk	A72	A8.137	Why is there no line length adjustment? Can we see the data that BT has provided?	See A8.137 in Consultation.
Talk Talk	107	§7.90	Ofcom comments that the impact of no line length assessment is 'fairly small'. How much is it?	Not quantified in the model, 09/10 RFS suggest 3% on D and E side copper Capital costs which we expect to fall in 10/11