

**Organisation (if applicable):**

Yim Siam Telecom

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

Yes

**Additional comments:**

I am very angry that BT thinks it can backdate the new 5.24% PRSBDS to 1st July 2010. We have been paying out revenue shares to our clients based on the current PRSBDS for the last 8 months and we have no way to get the overpayments back from them. OFCOM must not allow BT to backdate the new 5.24% PRSBDS to 1st July 2010, or it will kill our business.

OFCOM should set a new ate for the 5.24% PRSBDS to start when this consultation has ended.

Here are my points to support this:-

- OFCOM originally started this consultation in July 2009 expecting to get the regulatory accounting information from BT for 2008/09 by August 2009).

But, OFCOM did not get this information from BT until August 2010 and then only able to get BDO to do their work. BT caused a delay of 1 year..!!

BT keeps telling us that the new PRSBDS will be applied from 1st July 2010, and we keep telling them OFCOM will protect us small CPs because the delay is down to BT.

OFCOM must NOT uphold the 1st July 2010 date in the current consultation (due to finish on 24-03-2011) so that BT will be able to retrospectively ask us for the 2.2% difference in PRSBDS backdated to 1st July 2010 and put us out of business.

BT think they are a mighty big company and can control the market and exert influence over OFCOM due to their size. This must not happen and OFCOM must determine the date to be after the conclusion of the current consultation, some time after 24-03-2011.

- BT must not be allowed to start the new 5.24% PRSBDS on 1st July 2010 - it was their late sending of information to OFCOM that caused the one year delay to get to the final stage of

the consultation process - which is where we are today - and the financial consequences must be on BT's shoulders and not ours.

**Question 1: Do you agree with the proposed approach to the form and structure of the NTS Retail Uplift Charge Control, including the use of an RPI-X price cap for the period to September 2013, a single basket, a sub-cap on charges for freephone calls and a glidepath approach to price adjustments?:**

OK - fine

**Question 2: Do you agree that there is no longer any basis for excluding 20% of BT's sales and marketing costs? :**

OK - fine

**Question 3: Do you agree with the proposal to reattribute generic sales and marketing costs using net revenues and to treat support costs as an uplift on causally attributed costs?:**

OK - fine

**Question 4: Do you agree with our approach to determining base year costs and volumes?:**

OK - fine

**Question 5: Do you agree that we should use a forecast of change in BT's overall retail service activity to project BT's costs?:**

OK - fine

**Question 6: Do you agree with our approach to forecasting the change in BT's overall retail activity and the proposed range of forecast decline of 3.5% to 7.5% per year? If possible, please provide evidence to support your view.:**

OK - fine

**Question 7: Do you agree with our preferred efficiency improvement assumption of 2.5%?:**

OK - fine

**Question 8: Do you agree that our proposal for the value X with no one off adjustment to prices at the outset of the control has no impact on any previous aspect of our proposals?:**

OK - fine

**Question 9: Do you agree with our assessment of the potential options regarding the structure of the recovery for bad debt on PRS calls?:**

SUPPORTING INFORMATION IN THE "ADDITIONAL COMMENTS" ABOVE BOX.

**Question 10: Do you agree that BT's attribution methodology for bad debt is an appropriate starting point to use in assessing the incidence of bad debt on PRS calls?:**

SUPPORTING INFORMATION IN THE "ADDITIONAL COMMENTS" ABOVE BOX.

**Question 11: Do you agree with our view that no adjustment should be made to the PRS Bad Debt Surcharge for inefficiency? If not, please provide analysis and evidence to support your arguments:**

SUPPORTING INFORMATION IN THE "ADDITIONAL COMMENTS" ABOVE BOX.

**Question 12: Do you agree that in the current circumstances it is appropriate for the PRS Bad Debt Surcharge charge control to have effect on the first of the month following our final statement? If not, please supply reasons why this would be the case.:**

YES, BECAUSE OFCOM'S FINAL STATEMENT WILL BE PUBLISHED AFTER 24TH MARCH 2011. i HAVE EXPLAINED THIS IN SUPPORTING INFORMATION IN THE "ADDITIONAL COMMENTS" ABOVE BOX.

**Question 13: Do you agree with our proposals for monitoring BT's compliance with the NTS Retail Uplift charge controls?:**

YES. OFCOM MUST KEEP A STRICT WATCH ON BT.