

Organisation:

Optimity Ltd

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

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:

You may publish my response on receipt

Additional comments:

Question 3.1: Do you agree with our preferred option to set a control on a WLR core rental service to be available both to residential and business customers with the option for number entry to residential and business directories? Or do you consider that the alternative use of a basket would be a more appropriate control?:

I Agree with the moving to a lower price because, there is currently no added value/benefit to have a business line over having a residential line.

Additionally, many customers in the SME market will draw direct comparisons with consumer products/pricing. The 'business tariff' premium is not appreciated by very small businesses/home offices for directors

Question 3.2: If we are setting the control on a core WLR rental service are there any other features of the WLR Premium service, other than entry in a business directory, that would be required in the revised core rental service so that it would be suitable as a basic business product?:

could we have priority provisioning for Business lines? perhaps charged at a small premium to allow those customers/users who have an urgent requirement to pay so they can jump ahead..

Question 3.3: Please provide your views on the requirement for and if necessary, duration of any transition period for the implementation of a core WLR service?:

the sooner the better, why wait?

Question 3.4: What is your view on the appropriate basis of charges (cost orientation) regime for WLR Premium and other higher care level services? Do you consider that the other obligations on Openreach (perhaps supplemented by guidance on interpretation) are sufficient control on the WLR Premium charge without an additional basis of charge condition? (Responses to these questions will be considered in conjunction to the basis of charges (question 13.3) proposed in the Wholesale Review consultation):

I am happy for the entry fee to be dropped as long as we have the option to pay for swifter service/response

Question 4.1: Do you agree that it is important to ensure consistency between the WLR and LLU charge controls? In this context, do you agree that we will need to consider consistency in considering the impact on any challenges to assumptions when we are setting the final controls?:

Yes I do, it is very frustrating to know LLU providers are in a position to undercut us on installation prices. Leading us to question if we should consider moving networks

Question 4.2: Do you agree with Ofcom's analysis on the relative charges for WLR and MPF set out here, in Annex 5 of this document and in the Openreach Pricing Framework?:

don't know

Question 4.3: Do you agree with Ofcom's proposal to set a three and a half year period charge control for WLR?:

mostly - don't like the idea of indexing

Question 5.1: Do you agree that Ofcom should continue with its current approach to setting the transfer charge ceiling, recovering the transfer costs primarily through the line rental? If not, please explain why.:

yes

Question 5.2: If we do continue with a low transfer charge do you agree that Ofcom should increase the transfer to £3 with an index? If not, please explain why.:

whilst £3 is not a material sum of money I believe the increase of 50% on the original charge is a sharp step upwards

Question 5.3: Do you agree that Ofcom should continue to set a charge ceiling for new connections? Do you agree that it is appropriate to impose of one off adjustment in this case given the difference between existing charges and the CCA FAC cost? Do you agree it is appropriate to consider the relative charge of new line for LLU and WLR in making this adjustment?:

yes a ceiling keeps everyone on the side of the angels when it comes to pricing.

Question 5.4: Do you agree that Ofcom should exclude the remaining migration charges and calling and network features from the scope of the charge ceiling? If not, please explain why.:

don't know

Question 6.1: Do you agree with the approach we have taken to derive the core WLR rental? In particular do you consider the estimates for the cost of the WLR Premium care levels to be reasonable?:

they are a little high relative to line rental charges. I believe a decrease in the cost of Level 3 maintenance would increase revenue but not costs. The probabilities of line failure do not increase. Therefore there is increase revenue overall, there is an increased responsibility to respond swiftly, however Openreach routinely exceed the SLA for Level 1 maintenance. The primary difference is OOH this would be offset by the additional revenue to pay for the potential increased headcount. With a 24/7 culture we need to find a way to offer the support and meet end user needs more effectively than we do at present

Question 6.2: Do you agree with an allocation of common costs to the WLR Premium care level service?:

as long as the basis of apportionment is in line with actual usage, why not?

Question 6.3: Do you have any comments on the likely change in transfer or connection volumes in the latter part of this charge control period?:

i don't think it will make a material difference, there has always been a cost to gaining business from other CP's

Question 7.1: Please set out your views on the proposals set out in Section 7, together with the potential implications of the those proposals for CPs and for consumers, and the factors you consider we should take into account when determining the final pricing regime.:

don't know

Question 7.2: Do you agree with the proposed 25 days implementation period? If not please state your reasons and a preferred period?:

yes - the sooner the better

Question 7.3: Do you agree with our assessment that the proposed changes to conditions and directions meet the tests set out under the Act?:

yes

Question 7.4: Please provide any other comments you may have in response to the proposals set out in this document.: