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Dear Chris

Review of BT network charge controls

This response to Ofcom's consultation has been prepared on behalf of the Fixed Service Providers Group of the Federation of Communications Services, which represents more than 140 service providers and resellers of fixed telephony services including Wholesale Line Rental (WLR), calls packages and broadband. A list of our members can be found on the FCS website - www.fcs.org.uk

We are pleased to have the opportunity to provide a brief response to this consultation which proposes new network charge controls for a range of services provided by BT to other CPs.

In general, we agree with the principle of continuing with such controls for a further four year period. We are not in a position to comment directly on the methodology adopted by Ofcom in arriving at the new controls. However, we would like to make the following general points:

We do not believe that there will be significant migration to NGN voice services in the period. BT Wholesale has suspended development on Wholesale Voice Connect and has no plans to provide next generation voice products as part of the roll out of 21CN. To the extent that this affects Ofcom's assumptions, this should be factored in to the relevant calculations.

The proposed ranges within which changes to charging will be allowed are much wider than previously applied. Ofcom must monitor closely the introduction of any changes to ensure that any increases are justified in order to avoid market distortion.

We trust that the above comments are helpful and would welcome the opportunity to discuss any of the issues further with Ofcom.

Yours sincerely



Michael Eagle
General Manager