

**Question 1: What can Ofcom do to encourage timely standards development for new build NGA wholesale access products and interfaces? Which industry body is best placed to undertake the standardisation of these products and interfaces? What action should Ofcom take if these standards fail to materialise?:**

Enshrine in the planning approval requirements the provision of adequate fibre cabling throughout the development.

Leave the responsibility with BERR.

A penalty charge against the developer which would reduce the amount of 'bond' returned after a suitable maintenance period following completion of works.

**Question 2: Do you agree with Ofcom's approach to promoting competition and consumer choice in new build fibre access deployments?:**

Yes

**Question 3a: Do you a. believe that the existing obligations must be met by replicating the existing copper products, or that an alternative approach could be satisfactory? What are the implications of replicating existing products on fibre?:**

a) It may be quite restrictive to set a complete match of copper products as other materials will probably evolve over time and better to leave room for an alternative approach.

b) The implications of replicating the existing products on fibre I have presumed mean vast amount of Civil Works. This would have a serious impact on a local traffic authority's duty under the Traffic Management Act.

**Question 3b: Do you agree that SMP holders rolling out fibre do not need to roll out a copper network in parallel solely to meet their LLU obligation?:**

Yes.

**Question 3c: Do you agree with Ofcom's approach in relation to WBA and new build areas?:**

Yes.

**Question 3d: Do you believe that the WLR obligation must be met by replicating the existing copper product, or that an alternative approach based on an ALA-type product would be satisfactory?:**

No, replication should not be necessary if performance standards are maintained through the alternatives.

**Question 3e: Do you believe that the CPS obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?:**

No, answer as 3e.

**Question 3f: Do you believe that the IA obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?:**

No, as 3e.

**Question 3g: Do you agree with our proposal to interpret GC 3.1 (c) as being met through the provision and use of a battery backup facility to maintain uninterrupted access to emergency services in new build developments?:**

Yes.

**Question 4: Do you think access to the duct network, including non telecoms duct, is a potentially feasible means of promoting competition in new build? If so what types of commercial and operational models could successfully support such access arrangements in the UK?:**

Yes I do. For new build I would like to see multi-utility 'tunnels' being constructed.

**Comments:**