

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Review of the wholesale broadband access market 2006/07

To (Ofcom contact): David Clarkson

Name of respondent: Dr John Hunter and Dr Jason Whalley

Representing (self or organisation/s): Self

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
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Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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☐

Name

Signed (if hard copy)

We welcome Ofcom's identification that competition between networks based on local loop unbundling (LLU), rather than competition based on wholesale broadband products, is crucial to maintaining the UK's broadband progress. We do not intend to respond to any of the five questions listed in annex 11 of the consultation document, but rather raise an issue that we feel has been overlooked.

We are concerned by Ofcom's statement in section 1.3 that LLU is not economically viable on a national basis. Around one-third of the Scottish population has no LLU, and Ofcom does not anticipate any improvement in this figure. The corresponding figure for England is 16%, which would imply that proportionately more people in Scotland are without LLU, and the benefits that it brings in terms of competition etc, than in England.

Scotland has too many small exchanges to justify LLU investment by operators in each of the exchanges. In addition, exchanges are too far apart to be daisy chained together to provide cost effective shared access to backhaul using relatively short backhaul extension circuits. As these circumstances are unlikely to change, we believe that LLU as currently implemented does not meet the needs of the Scottish market. Consumers are being denied fast broadband access, and innovative service developments such as the bundling of voice with broadband at seemingly ever-lower prices.

As a consequence, Ofcom needs to develop either a viable alternative or demonstrate how regulation can deliver fast broadband access and bundled services in those parts of the UK where there is no LLU. A failure to do so will result in those consumers living in areas where there is no LLU-based competition being placed at a disadvantage with all the inevitable consequences that this entails.

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