Question 1: What are your views on Ofcom?s proposed three-year strategic policy framework?:

Agree with general policy of permitting increased self-regulation in telecoms service provision and spectrum management, and promotion of competition but trust that a certain level of monitoring will be retained to enable regulation should anti-competitive behaviour begin to control market-forces.

Question 2: What are your views on Ofcom?s proposed priorities for 2007/8? In particular::

As above and suggest that the UK could lead internationally in spectrum management as shown in recent ITU workshop thanks to Cave Audit and subsequent processes. Would also suggest however that, were the amount of resources dedicated to spectrum management proportional to the importance suggested in the priorities, much more progress could be made and the discontinuation of the SES fund could be overcome permanently due to a bigger budget. The Olympics in particular will require a great deal of discussion and change if provision of spectrum for the games is to be a success.

Question 2a: What are your views on the work which Ofcom should do in 2007/8 to drive a market-based approach to spectrum?:

I believe that the availability of new spectrum and spectrum trading are key to maximising use of the spectrum, creating new markets and enabling UK PLC to gain the greatest potential benefit, however I believe that the public sector discussions and work that must be held before these can be implemented are substantial and that progress will be slower than may be expected purely due to the workload. Certain targets have already been missed and I fear that without more resources devoted to these issues timelines will slip.

Question 2b: What are your views on the work which Ofcom should do in 2007/8 to develop new ways to deliver public outcomes as platforms and services converge? :

Ofcom has been doing good work in this area over the last few years, eg. facilitating the more widespread use of technology like LLUs, regulation of broadband providers to bolster competition, protect consumers, increase take-up and enable the upgrading of networks, and this sort of work should continue. However, it should be noted that convergence is a continuing theme and that industry action is moving in this direction as a result of consumer demand, seemingly independent of regulatory input. I believe Ofcom?s perceived requirement to ?ensure people have the knowledge and skills to use communications services effectively? is overstated and that industry is providing technology that is simpler than ever to use, and that consumers themselves are increasingly technologically fluent. If a service is not used it could simply be not wanted. Where consumers do require protection is from overly complex signup, billing and service-transfer processes.

Question 2c: What are your views on the work which Ofcom should do in 2007/8 to improve business compliance and empower consumers? :

See 2b

Question 2d: What are your views on the work which Ofcom should do in 2007/8 to promote competition and innovation in converging markets?:

See 2b

Question 3: Are there additional areas where Ofcom should reduce regulation and minimise administrative burdens? Please provide specific examples.:

Comments: