

Mr Alistair Bridge
Sixth Floor
Strategy & Market Developments
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

20 February 2007

Dear Mr Bridge,

Ofcom Draft Annual Plan 2007/2008

Friends of the Lake District (FLD) is a registered charity with around 7000 members. We represent the Campaign to Protect Rural England in Cumbria, and are a member of the Council for National Parks. Issues relating to the telecommunications industry have featured throughout our history. Recently we have been campaigning more actively to reduce the impact of overhead wires, including telephone lines, on the landscape.

We welcome this opportunity to respond to Ofcom's consultation on its next Annual Plan but were disappointed that Ofcom did not acknowledge its statutory duties to designated landscape areas as outlined in the Defra guidance note published in 2005¹.

We believe that increasingly members of the public seek benefits to be measured not only in terms of choice, keen prices, reliability and network coverage, but also to take account of environmental impacts. These impacts include visually intrusive telephone lines. We are not asking for more intervention or regulation but rather that Ofcom, as the regulator of BT Openreach, provides incentives to enable lines to be placed underground in National Parks and AONBs in the same way that Ofgem has acted in regulating the electricity industry. The majority of electricity distribution companies have taken up the Ofgem undergrounding allowance; this has put the spotlight on associated telephone lines particularly in areas where village schemes have been agreed.

This seems the perfect time to enable Openreach to work with electricity distribution companies to agree joint schemes to the benefit of some of our most valued landscapes. In addition working with electricity distribution

Murley Moss
Oxenholme Road
KENDAL
Cumbria
LA9 7SS
(Registered Office)

Tel: 01539 720788
Fax: 01539 730355
E-Mail: info@fld.org.uk
www.fld.org.uk

President:
Lord Judd

Vice Presidents:
Sir Chris Bonington CBE
Lord Chorley

Chairman:
Brian Jones

Executive Director:
Andrew Forsyth

Policy Officers:
Jan Darrall
Jack Ellerby
Judith Moore

Planning Officer:
Richard Pearse

Communications Officer:
Martin Varley

Membership Officer:
Cassie Nelson

Administration Officer:
Ian Hague

Administration Assistant:
Jean Smith

¹ Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads.



companies on schemes, for example joint trenching could save costs and thus provide benefits to consumers in both visual and cost terms. We believe Ofcom has a central role to play in enabling this to happen.

In this annual plan we would like to see a commitment to:

- Engage with Openreach on this issue. We appreciate that Openreach is not subject to the same environmental duty as Ofcom as it and BT are not classed as public bodies. However we still believe they should have due regard to the environment.
- Encourage Openreach to engage with electricity distribution companies on joint working in areas where telephone lines are associated with electricity lines that have been identified for undergrounding using the Ofgem allowance.
- Include questions on undergrounding overhead telephone lines to reduce visual impact in future research with consumers.
- Develop a model framework for an allowance to underground telephone lines in specific circumstances.

We are happy to note that a meeting has been arranged in mid April with representatives from both Ofcom and BT Openreach to discuss our concerns in more detail. We hope this will provide an opportunity to take forward some of the ideas we have described in this letter.

Yours sincerely,

Penny Ozanne

Penny Ozanne
Project Officer - Overhead Wires
Friends of the Lake District

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Oxenholme Road
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