

Ofcom Strategic Review of Telecommunications

Response submitted by CCL – 12th August 2005

Caudwell Communications supports OFCOM in the Consultation on undertakings offered by British Telecommunications plc in lieu of a reference under Part 4 of the Enterprise Act 2002.

Caudwell has also responded in support of UCKTA's response. To this consultation.

In doing so CCL would like to draw attention to the following areas:

The timescales stated must be adhered to and any deviation from these timescales, out with the control of BT, must be clearly penalised in these circumstances.

Whilst creating a new division requires a great amount of focus and effort there should be no shift of focus from current product / service issues which require addressing and resolving.

Within the implementation of ASD a plan of resolution and measurement post live of this service to allow easier identification of issues and subsequent resolution of these issues must be detailed out. It would be unacceptable to CCL for SP's to experience the same level and indeed elongated timescales to fix issues found with the current WLR products and service offering from BT.

Further and greater detail is required on the following

- product and the supporting process designed around those products to be offered by ASD
- Migration strategy to ASD products from BTW products, as such immediately SP's would be at a disadvantage due to potentially complicated and costly migration procedures.
- The organisation of the ASD, whilst on a high level has been displayed; again the concern here is lack of details particularly surrounding the arrangements of internal financial procedures, product reselling through BTW and prioritisation of network.