

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: BT ASD - [Notice under Section 155\(1\) of the Enterprise Act 2002](#)

To (Ofcom contact): dougal.scott@ofcom.org.uk

Name of respondent: James Blessing

Representing (self or organisation/s): Entanet International

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Name/address/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

Note that Ofcom may still refer to the contents of responses in general terms, without disclosing specific information that is confidential. Ofcom also reserves its powers to disclose any information it receives where this is required to carry out its functions. Ofcom will exercise due regard to the confidentiality of information supplied.

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

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Name

James Blessing

Signed (if hard copy)

Having read your document "Notice under Section 155(1) of the Enterprise Act 2002" I need to make a number of observations...

The document seem to take the line that BT is capable of maintaining a chines wall between its division. I have lost count of the number of times BT engineers and 150 staff have told our customers that 'If you'd have gone to BT you would not have this problem' or similar pronouncements.

Breaking the wholesale and retail arms of BT into separate functions would resolve this issue (especially if the wholesale arm isn't called BT...) but it requires it to be broken at the wholesale/retail level rather than at an arbitrary access level.

Let me explain... Very few people buy just access from BT - they either buy a collection of Wholesale products or they but a full service from BT Retail (or even more bizarrely some, like ourselves, who buy Wholesale products via BT Retail SPG) those (like ourselves) would be in the situation of having 3 separate account managers depending on the products we buy rather than a single contact within the wholesale arm.

21stCN will also muddy the water further and breaking the wholesale arm into back haul and access will make the landscape harder to navigate.

I know this is unlikely to be a popular solution, but if Ofcom desire a strong market then SP's require that they have a strong wholesaler committed to providing the best solutions to ALL SP's.

On a separate note forcing BT (which ever part you feel best) to provide Dark Fibre on request at a regulated cost to SP's who require it would help those SP outside of London...