

VECTONE MOBILE LIMITED
(Formerly known as Mundio Mobile Limited)
54 Marsh Wall, London E14 9TP
Tel (+44) 20 75364 800

OFCOM - MCT consultation

Riverside House,
2a Southwark Bridge Road
SE1 9HA London

02 October 2017

Re: Wholesale Market for Mobile Call Termination "MCT" - Consultation.

Dear Sirs,

We refer to the consultation opened by OFCOM on 27 June 2017 for proposals to regulate the wholesale market for MCT.

Vectone would like to share with you its main concern regarding MCT rates.

As per the Full MVNO model, MVNOs are offering services on MNOs networks. MNOs are charging each service on a per unit basis for Voice, SMS and Data.

Operators are charging their customers for originated services for Voice and SMS only and are covering their charges for services terminated on their network through the so-called "termination service charge" at a wholesale level.

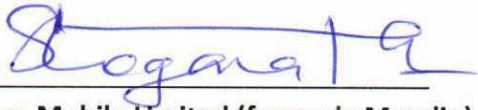
However, MVNOs are being charged by their MNO for mobile termination (MT) for Voice and SMS and consequently receive limited or null incomes for terminating services on their network. If the MCT is regulated below the MT charged by MNOs to MVNOs, the MVNOs will not be able to cover their costs for terminating services on their network.

We are asking Ofcom to take the Full MVNO model into consideration while making decision on the MCT and authorise Full MVNOs to charge a higher MTR than the MNOs MTR rate.

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We remain at your entire disposal for any further question.

Kind regards,



Vectone Mobile Limited (formerly Mundio)
Loganathan Subramaniam