

Your response

Volume 1: Market review

Contemporary Interface (CI) Access

Question	Your response
Question 4.1: Do you agree with our proposed approach to product market definition? Please provide evidence to support your views.	Confidential? – Y / N
Question 4.2: Do you agree with our proposed CI Access product market definition? Please provide evidence to support your views.	Confidential? – Y / N

Question 5.1: Do you agree with our proposed approach to geographic market analysis for CI Access? Please provide evidence to support your views.

Confidential? – N

On a recent INCA Policy & Regulatory SIG call we discussed the BCMR. INCA members have different approaches to business connectivity, so we have not responded to all the questions in this consultation. However, members on the call expressed concern that Ofcom seems to have suddenly changed a reach threshold of 90% to one of 65% for defining HNRs, and that this leads to premature deregulation.

One potential explanation for the change is that Ofcom is reluctant to re-regulate locations that were deregulated in the temporary conditions. However, due to the issues with service share data set out in the BCMR (which was also present for the 2016 BCMR, but not discovered by then) those locations were identified based on erroneous service share data. The 2016 BCMR underestimated BT's share in high speed markets by >20%.

The corrected data shows that BT's service shares are again very high, which would affect the definition of HNRs - unless the threshold is reduced from 90% to 65%.

Question 5.2: Do you agree with our proposed definition of geographic markets for CI Access? Please provide evidence to support your views.

Confidential? – N

See Answer to 5.1 above.

<p>Question 6.1: Do you agree with our proposed approach to SMP assessment for CI Access in the UK excluding the Hull Area? Please provide evidence to support your views.</p>	<p>Confidential? – N</p>
<p>Question 6.2: Do you agree with our proposed SMP findings for CI Access in each of the geographic markets defined? Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>

CI Inter-exchange connectivity

<p>Question 7.1: Do you agree with our assessment of inter-exchange connectivity? Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 7.2: Do you agree with the proposed market definition? Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 7.3: Do you consider that our list of BT exchanges for de-regulation is correct? Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>
<p>Question 7.4: Do you agree with our list of Principal Core Operators (PCOs)? Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>

Traditional interface (TI) services

Question 8.1: Do you agree with our proposal not to regulate the low bandwidth TI services market on the basis that it no longer fulfils the three-criteria test set out in the European Commission Recommendation? Please provide evidence to support your views.

Confidential? – Y / N

Hull Area

Question 9.1: Do you agree with our proposal to deregulate the retail market for CI services at all bandwidths in the Hull Area? Please provide evidence to support your views.

Confidential? – Y / N

Question 9.2: Do you agree with our analysis and proposed findings in relation to the wholesale market for CI Access services at all bandwidths in the Hull Area? Please provide evidence to support your views.

Confidential? – Y / N

Question 9.3: Do you agree with our proposal to deregulate wholesale TI services at all bandwidths in the Hull Area? Please provide evidence to support your views.

Confidential? – Y / N

Approach to remedies

Question 10.1: Do you agree with our proposed approach to remedies? Please provide reasons and evidence in support of your views.

Confidential? – Y / N

--	--

General remedies

Question 11.1: Do you agree with the general remedies that we propose? Please provide reasons and evidence in support of your views.	Confidential? – Y / N
---	-----------------------

Specific dark fibre remedy for inter-exchange connectivity

Question 12.1: Do you agree with the aims and effect of our proposed dark fibre remedy? Please provide evidence to support your views.	Confidential? – Y / N
Question 12.2: Do you agree with our proposed scope of the remedy? Please provide evidence to support your views. Please provide evidence to support your views.	Confidential? – Y / N
Question 12.3: What scope do you expect to have for cost savings as a result of the proposed dark fibre remedy? How large do you expect any cost savings to be? Please provide evidence to support your views.	Confidential? – Y / N
Question 12.4: How many orders for dark fibre would you envisage placing during the two-year review period? Please provide evidence to support your views.	Confidential? – Y / N

Question 12.5: Do you agree with our proposed timeline for dark fibre implementation? Please provide evidence to support your views.

Confidential? – Y / N

Specific remedies for active products

Question 13.1: Do you agree with the specific network access remedies that we propose for CI services at all bandwidths in the business connectivity markets? Please provide evidence to support your views.

Confidential? – Y / N

Specific remedies for interconnection and accommodation

Question 14.1: Do you agree with the specific remedies for interconnection and accommodation that we propose? Please provide evidence to support your views.

Confidential? – Y / N

Quality of services (QoS) remedies

Question 15.1: Do you agree with our proposals regarding the application of QoS standards, KPIs, SLAs and SLGs over the period of this review? Please provide evidence to support your views.

Confidential? – Y / N

Remedies in the Hull Area

Question 16.1: Do you agree with the remedies in the Hull Area that we propose? Please provide evidence to support your views.

Confidential? – Y / N

Volume 2: Leased line charges control

Objectives and approach in setting the leased lines charge controls

Question 2.1: Do you agree with the proposed form of charge controls? Please provide evidence to support your views.

Confidential? – Y / N

Charge control design

Question 3.1: Do you agree with each of our proposals in relation to the design of charge controls for active services at 1 Gbit/s and below? Please provide evidence to support your views.

Confidential? – Y / N

Question 3.2: Do you agree with each of our proposals in relation to the design of charge controls for active VHB services? Please provide evidence to support your views.

Confidential? – Y / N

Question 3.3: Do you agree with each of our proposals in relation to the design of charge controls for accommodation services, Excess Construction Charges and Time Related Charges? Please provide evidence to support your views.

Confidential? – Y / N



Inter-exchange dark fibre charge control

Question 4.1: Do you agree with our proposals in relation to the design of a charge control for inter-exchange dark fibre? Please provide evidence to support your views.

Confidential? – Y / N

Implementation, compliance and legal tests

Question 5.1: Do you agree with each of our proposals in relation to the implementation of charge controls? Please provide evidence to support your views.

Confidential? – Y / N