

Your response

Question	Your response
Question 1: Do you agree with our proposal to designate KCOM in the Hull Area?	Yes
Question 2: Do you agree with our proposal to designate BT for the whole of the UK except for the Hull Area?	Yes
Question 3: Pursuant to paragraph 3(2)(c) of the 2018 Designation Regulations, are there alternative proposals from any other person to be designated as a Universal Service Provider instead of BT or KCOM?	No
Question 4: Do you agree that the threshold for an affordable price for the purposes of USO eligibility should be set at £45 a month (including VAT, connection charges, monthly payments and other broadband charges)?	No. The issue is that this acts as a form of price control by the back door. If fibre operators don't produce a USO compliant solution, then they potentially risk overbuilding, which may be paid for by the industry at large.
Question 5: Do you agree with our proposed approach to how Universal Service Providers should check eligibility for the USO?	Yes, provided there are protections against bulk access to coverage data from other operators
Question 6: Do you agree with our proposed approach to how Universal Service Providers should take account of shared connection costs?	Partly. In areas close to our own coverage, we are likely to be able to provide USO coverage at a lower cost than the USP, with the added benefit of future proofing. There appear to be no mechanisms for dealing with this in the Ofcom proposals.
Question 7: Do you agree with our proposed approach to informing consumers of the outcome of their USO request?	Yes.
Question 8: Do you agree with our proposal to include a universal service condition requiring Universal Service Providers to raise awareness of the USO?	Yes
Question 9: Do you agree with our proposals set out above, including to set a timeframe of 12 months for the delivery of USO connections unless exceptional circumstances have arisen?	Yes, but this period should also be applied to other operators with existing fibre coverage in determining USO availability at the margins of coverage. To do otherwise would be to discriminate in favour of the USP provider for no justifiable reason.

<p>Question 10: Do you agree with our proposals on how exceptional circumstances should be defined and operate?</p>	<p>No comment</p>
<p>Question 11: Do you agree with our overall approach to ensuring USO connections and services are affordable, specifically on: a) our proposal to introduce a two-part obligation imposing (i) an equivalent pricing requirement, and (ii) a safeguard cap; and b) setting the level of a safeguard cap at £45 per month (including VAT, averaged over the fixed commitment period, including any upfront connection charges, monthly payments and other broadband charges)?</p>	<p>Partly. See comments above. There is a difference between a cap on a copper or wireless solution that has little chance of upgrade when the USO thresholds are likely increased, and the price of a future proof full fibre connection. The £45 doesn't properly recognise the difference.</p>
<p>Question 12: Do you agree with our proposal to ensure that USO customers receive at least the same quality of service as non-USO customers?</p>	<p>Yes, but the difficulty is in defining and policing this. As Ofcom is aware, copper based solutions are susceptible to heavy rainfall, due to moisture ingress into paper insulated copper. These conditions are more likely to apply to the longer lines that may be used in USO provision. It is difficult to see how these technical shortfalls can be addressed by regulation.</p>
<p>Question 13: Do you agree with our proposed approach to complaints handling and dispute resolution?</p>	<p>No comment.</p>
<p>Question 14: Do you agree with our proposal to approve the two Alternative Dispute Resolution schemes currently approved under the General Conditions (Ombudsman Services: Communications and the Internet Services Adjudication Scheme) for resolving disputes in relation to the USO?</p>	<p>No comment</p>
<p>Question 15: Do you agree with our proposed approach to how the Universal Service Providers should report on their performance and maintain records?</p>	<p>Yes</p>
<p>Question 16: Do you agree with our approach to how Ofcom should report and monitor delivery of the USO?</p>	<p>Yes</p>
<p>Question 17: Do you agree with our proposed approach to require Universal Service Providers to maintain accounting records?</p>	<p>Yes</p>