

Your response

Question	Your response
Question 2.1: What are your views on our general approach to regulation and geographic differentiation in this review?	<p>The proposal does not appear to include any regard to investments over the next 5 to 10 years by Altnets for Ultrafast/Giga services which may result in geographical monopolies.</p> <p>In fact the proposal specifically references non-competitive areas as those where Openreach will be the only provider. However there will be increasing areas in the UK where a single Altnet provider will be present with possibly a single ISP or limited availability of ISPs. Meaning that the consumer has no choice of their network provider if requiring higher level products and that this situation may remain for decades to come.</p> <p>In addition to Altnet rollout there are also large new housing developments (neighbourhoods of 7000+) underway with provision of communications by a single arrangement between a developer and an Altnet. To have a phone will mean having broadband and in some cases this will include central provision of Terrestrial TV, Satellite, Radio etc with external aerials specifically prohibited under covenant. That means that consumers will be tied to both the services and prices of that particular provider. These sites do not have any Openreach presence and any such presence would be uncommercial or feasible under a USO.</p> <p>Therefore the proposal does not address geographical monopolies under the definition of Non-Competitive areas and there are three key requirements in my view that should be considered on behalf of the consumer.</p>
<p>A SOCIALLY INCLUSIVE ENTRY PRODUCT</p> <p>There is no obligation on an Altnet to provide or maintain a low cost product for those requiring a basic telephony and broadband product if Openreach are not present. Particularly on new builds where Openreach will have no infrastructure. If someone retires or becomes incapacitated in anyway such their income falls they can control their gas, electricity and water costs but the cost of communications may be prohibitively high for them to continue to access them.</p> <p>A PROVISION COVERAGE OBLIGATION</p> <p>As an Altnet rolls out a network there will always be a perimeter border outside which provision will not be available. However there are no coverage obligations for all premises within the rollout area. Therefore due to engineering difficulties or technical limits some premises, or groups of premises, could be excluded from rollout plans such that they become isolated islands surrounded by the Altnet provider. These islands would be prohibitively costly for other FTTH providers to address later therefore if no such obligation is applied then such premises may never get Ultrafast/Giga facilities.</p>	

QUALITY OF SERVICE MEASURES

Not all providers are providing the same level of service for a given speed. i.e two providers may provide 900Mbps FTTH service but performance will depend on the equipment specification, topology and ratios chosen within their design. As we move to FTTH provision both the overall speed and reliability of the network will improve drastically. However personal experience has shown that despite higher broadband speeds (well above normal consumer use) some ISPs are unable to sustain a resilient TV stream of 5 or 10 Mbps particularly at peak times despite speed tests indicating no issue. This will become more acute as we move to 4k TV streams other future services.

Therefore when considering competition and comparing FTTH my view is Ofcom should not simply depend on stated line speeds, the investment by the Network Provider must include minimum QoS requirements including network response, error rates and stated/appropriate network ratios.

In addition ISPs should be subject to providing QoS measures based possibly on the ITU Categories for QoS (Streaming, Browsing, File Transfer, M2M etc).