

FCS Response to Ofcom's Consultation on the Hull Area Wholesale Fixed Telecoms Market

Introduction

The Federation of Communication Services represents companies which provide professional communications solutions to (primarily) business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Most FCS members operating in the fixed services space are customers of Openreach which is a critical provider to this sector.

Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest national and international private enterprises and public-sector users. FCS is the largest trade organisation in the professional communications arena in the UK, representing the interests of around 300 businesses who supply B2B services nationwide.

FCS Response

We welcome the opportunity to respond to Ofcom's consultation on its review of the Wholesale Fixed Telecoms Market in the Hull Area

We have provided a brief response, setting out our main area of concern rather than responding to the individual consultation questions.

We agree with Ofcom's finding the KCOM has retained a de facto monopoly at both wholesale and retail level in the Hull area. Over the years, this has been damaging - not only to competition in the Hull area but has adversely impacted independent communications providers who wish to provide services to customers with a national presence which includes Hull. For this reason, we welcome any steps which Ofcom is taking to address and mitigate this.

While we welcome the proposed relaxation of KCOM's WLA reference offer, it remains a concern this will still require an interconnection, which restricts the number and type of providers who can provide services at retail level.

We would prefer a simple "Wholesale Access" type of arrangement, similar to that provided by Openreach via WLR.

FCS hopes that these comments are helpful to Ofcom in its considerations. Considering the importance of this review, we are keen to discuss our response in further detail and would welcome a meeting to do this.