

Your response

Question (Volume 2)	Your response
<p>Question 2.1: Do you agree with our proposed market definition of the WLA market? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 2.2: Do you agree with our proposal that KCOM holds SMP in the supply of WLA products in the Hull Area? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 3.1: Do you agree with our proposed market definition of the LL Access market? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 3.2: Do you agree with our proposal that KCOM holds SMP in the supply of LL Access in the Hull Area? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 4.1: Do you agree with our proposal not to regulate the WBA market in the Hull Area on the basis that the increased viability of use of KCOM’s WLA FTTP product reduces the barriers to entry into the WBA market? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – [Yes, in part.]</p> <p>No.</p> <p>Dealing with KCOM Wholesale over the previous year has improved and better systems are promised, however nothing has materialised yet. The ordering and lifecycle processes are still clunky with a total lack of automation. A CP does not have the same level of access to internal systems as KCOM retail do.</p>

For instance, we cannot have sight of a simple light level reading for an optical device, nor can we see if a session is active, or when it last logged on or off. This complicates our technical support triage process and further frustrates the customer as we have to escalate these queries to KCOM wholesale and wait for their response. We have had reports of KCOM engineers asking questions of our customers along the lines of “why use a different CP when it’s just a white label KCOM service.” It has also been mentioned that if there is an issue with the service that the CP will just have to call KCOM to get the issue resolved. This is far from ideal and highlights the need for further training and separation of the wholesale and retail arms. There is confusion also when an engineer turns up to perform an installation. They typically arrive in a KCOM branded vehicle wearing KCOM branded clothing with a KCOM ID badge. Routers are shipped as standard with a cardboard outer sleeve and enclosed instruction guide that are both heavily KCOM branded. To all intents and purposes, the customer believes that they are getting a service from KCOM, rather than the wholesale partner. The lack of legal separation between the retail and wholesale arms of the organisation needs further investigation and should mirror much more closely that of BT and Openreach. KCOM have been investing heavily in a network build outside of the licensed area, this was announced in early 2019. We approached KCOM with a view to reselling services on the new build networks in January 2019. Despite numerous reminders we are still waiting for an answer, 8 months later. This does not instil confidence that KCOM wholesale will operate in a way that provides fair, transparent and timely access to network for all of it’s wholesale partners, of which KCOM retail is one. This is evidenced by the fact that KCOM retail are actively retailing on the newly built network. With a lack of oversight from Ofcom we fear that what has been achieved so far will deteriorate rather than improve.

[X]

Question 5.1: Do you agree with our proposal not to regulate WFAEL, ISDN2, ISDN30 and WCO markets on the basis that they no longer fulfil the three criteria test set out in the EC Recommendation? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes

Question (Volume 3)	Your response
Question 1.1: Do you agree with our proposed approach to remedies? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes
Question 2.1: Do you agree with our proposed remedies? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes
Question 3.1: Do you agree with our proposed regulatory financial reporting SMP condition and directions? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes
Question 5.1: Do you agree with our proposed transitional remedies for the WFAEL, ISDN2, ISDN30 and WCO markets? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes