

Review of the Market for Standalone Landline Telephone Services

Consultation response from Jay Drummond

Question 3.1: Do you agree with our provisional conclusion that there is a separate market for Standalone Fixed Voice residential access which includes both voice-only and split purchase consumers? Please provide reasons and evidence in support of your views.:

The provisional conclusion is unfair to BT PLC & all consumers by not providing choice or fair price & a further unfair Universal obligation on BT ONLY on top of BT Basic - that UNIVERSAL obligation should be on all telecom providers using the BT Openreach network at any local street cabinet/exchange point of termination of telecommunication - currently nationally only Virgin Media provide a landline service with no BT Openreach connection. It also does not address the matter at hand of Line Rental gouging by ALL telecom providers using BT Openreach, a asset paid for by the taxpayer and given to BT PLC at no cost. It does not provide everyone regardless of financial background the right to access affordable telecoms for the right of communication, a freedom under the Declaration of Human Rights. Naked ADSL/Fibre or Fixed voice customers should pay the BT Openreach Wholesale price for Line Rental, currently LR is subsidising company profits & other consumers 'unlimited' bundles.

Question 3.2: Do you agree with our provisional conclusion that there is a separate market for Standalone Fixed Voice residential calls? Please provide reasons and evidence in support of your views.:

Yes, but it does not address the issue of naked ADSL/Fibre broadband, any consumer may prefer a mobile phone as 'one' number contact and broadband for internet access and these people are penalised just as much as the focus of this unfair consultation for one demographic based on 'age' & not cost for ALL consumers, any consumer is financially vulnerable not just a demograph of age or ONE telecom provider (BT)

Question 4.1: Do you agree with our provisional conclusion that, during the period covered by this market review, BT will have significant market power in the standalone fixed voice access market? Please provide reasons and evidence in support of your views.:

Yes and no. Market power is abusing Line Rental costs beyond cost passed onto the consumer, all telecom providers using the BT Openreach network are abusing, BT Retail are not alone in doing such

Question 5.1: Do you agree with our provisional conclusion that, during the period covered by this market review, BT will have significant market power in the standalone fixed voice calls market? Please provide reasons and evidence in support of your views.:

Yes, including because Ofcom forces consumers to use BT Basic below the Line Rental wholesale price and allows excessive call charges outwith little inclusions.

Question 7.1: Do you agree with the need to trial and test engagement remedies before implementation? Please explain your reasons for this.:

No, universally consumers accessing BT Openreach network should pay BT Wholesale LR costs at source cost to their telecom provider, this does not require testing, it requires Ofcom action towards inclusion of society.

Question 7.2: Do you agree that remedies focussed on improving consumer communications to increase engagement listed below offer a reasonable prospect of success in encouraging competition?

- **information on savings;**
- **information on the switching process;**
- **introduction of a decision point; and**
- **remedies to facilitate response to this information.**

Please explain your reasons.:

No. BT Retail was separated from BT Wholesale/Openreach to encourage competition, BT Retail has abused its position of LR pricing and led the market in a cartel of unacceptable LR costs rises since, Ofcom has regulated LR via Openreach to no benefit to any consumer, the benefit of wholesale LR pricing has always been to the telecom provider revenue not the end user.

Question 7.3: Do you agree with our conclusions that the other remedial options we have considered, namely the establishment of a customer database for marketing purposes and automatic switching within BT's tariffs, raise significant implementation risks and therefore do not warrant further consideration? If you do not agree or consider there are other options we should have considered, please provide your reasons.:

No, Ofcom need to stop focusing solely on BT Retail and focus on the market cartel of overinflated LR costs in comparison to provider costs and deal with the issue at root cause - Wholesale costs should be passed to consumer and additional or third party products feed profit of telecom providers. The market is focused on bundled & unlimited products with high line rental, most 'regular use' telecom users expect a price fair to their usage and not to be subsidising other users and shareholders.

Question 8.1: Do you agree with our approach to determining the options for the level of price controls for standalone fixed voice services? If not, please give your reasons.:

No, BT Openreach access fees should be Line Rental fees paid by end user not the almost 100% more (profit) for BT Retail users whilst penalising consumers choice by not making such universal obligation against all telecom providers. BT Basic should be abolished with the idea only BT Retail Voice only customers LR should be capped. The same 'residential' service of Line Rental should be non profit across the sector. Currently BT Basic covers low users but is excessive charging outwith compared to other BT plans and other telecom providers offerings, infact in trying to help low income or voice only households by not creating sector competition is stifled. BT Basic customers with non BT broadband can pay 3-4 times more for broadband and esp ongoing health issues flares make overcharges unaffordable. Line Rental at cost with one provider and calls or broadband with others instead of bundled only would create competition based on fairness. Voice only customers can pay per use or a 'bundle'

Question 8.2: Do you agree with our proposed basket structure if implementing a price control for standalone fixed voice services? In particular, do you agree with the need for a separate sub-cap on the Line Rental within the basket? If not, please give your reasons.:

LR should be capped at Wholesale cost for all Openreach telecom operators.

Question 8.3: Do you agree that it would be appropriate to allow the prices in a price control basket to rise by up to consumer price index? If not, please give your reasons.:

No LR should be charged as per Wholesale cost, the market should not have one rule for them and another for consumers. Unify by Universal obligation of all telecom providers to not make profit off access to communication via LR.

Question 8.4: Do you agree that we should exclude Home Phone Saver and Line Rental Plus from the price control? If not, please give your reasons.:

No, home line saver would not be needed and thus regulated in a Wholesale Line Rental for end user cost, as Q8.3 providing such cuts down on Ofcom staffing time management at all levels, levels out a even playing field for providers & consumers.

Question 8.5: Do you agree that it is appropriate for the Line Rental sub-cap to have greater price flexibility than the overall price cap to allow BT to rebalance pricing between the line rental and call prices? If not, please give your reasons.:

No. The market needs capped to no profit LR not exclusively only BT, whilst removing excessive costs of LR to its actual cost as set by Ofcom to BT Openreach and thus open all consumer spends per consumer low or high per month open to competition for all consumers to benefit by enforcing competing service providers offers are competing and fair access fee. BT Openreach obligations on broadband continue, not (ONLY) BT Group subsidising BT Basic, a whole open market of competition with same price LR at wholesale cost.

Question 8.6: Do you agree with the services we are proposing to include in a price control remedy basket for standalone fixed voice services? If not, please set out your alternative proposals and please give your reasons.:

No. Universal WLR is fair to the market, service providers & consumers. Consumers pay per additional products: call & broadband service providers, bundled or unbundled.

Question 9.1: Do you agree with our proposed set of remedies for the standalone fixed voice services markets, that is a price control, with a one-off adjustment set with reference to the costs of BT competitors in this market, and an obligation on BT to work with us to explore and ultimately implement information options to promote competition? If not please set out your reasons.:

No. The market should be able to compete itself without Ofcom interference. No adjustment is needed, controlled or reviewed by Ofcom if WLR is what consumers as end user pay, no offset to anyone is then needed as the market all plays fair on LR. Competition is on further products after WLR.

Question 9.2: Do you agree that BT should have at least one month after the date of the statement to implement the new price structure? If not, please set out your reasons.:

No. All telecom service providers should be set a equal field by setting that field known now as LR as a 'Openreach Access Fee' charged at the BT Wholesale price as set by Ofcom.

Question 9.3: Do you have any additional comments on our analysis or conclusions in this consultation?:

The focus on 'vulnerable' groups of 'Voice only' and 'BT Basic' is fragmenting the market unfairly on BT and pay per use costs on consumers are excessive - including excessive profits market wide from LR, LR refers to a time BT was a GPO monopoly prior to the sector opening to other companies. This LR 'access fee' should be billed at cost and renamed BT/Openreach Access Fee, it no longer is line

rental as that is regulated by Ofcom as a access fee. LR is purely a over inflated outdated descriptor of a BTOR access fee at public/consumer level. It is well overdue & time for Ofcom to change the terminology & price gouging of a regulated BTOR access fee RESOLD as Line Rental as the GPO or public ownership of BT no longer exist - neither should sole 'GPO' obligations and updated obligations lie on only BT PLC but on any telecom service provider using the BTOR network to provide telecom services to the end user/consumer. STOP misleading consumers referring to 'GPO terminology'