

## **Review of the Market for Standalone Landline Telephone Services**

### **Consultation response from Kenneth Smith**

***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.:***

YES. My latest bill is for £61.80 of which £56.97 is for line rental, some 90%. It should be noted that I use the BT 'Unlimited Weekend Plan', however I do not consciously use the phone ONLY at weekends.

***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.:***

See previous rely. Also I have been informed by among others BT, that due to my rural location being more than 6 miles from the nearest roadside comms box that there is NO foreseeable prospect of my accessing services such as broadband other than my present situation of using expensive satellite comms (Avanti PLC)

***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.:***

No knowledge of any other viable provider service in my location

***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.:***

This appears to be a repeat of Q4.1 ??

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

YES. To prevent stalling tactics by opponents to the proposal

***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.:***

Yes

***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 comment. Not qualified to judge

**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.:**

Yes

**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.:**

Yes

**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. This is simply an excuse to raise prices without taking account of efficiency savings opportunities and without justifying reasons to annually increase profits.

**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. BT and others should have to show that these are not simply devices for excluding certain customers from the proposed savings

**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.:**

Call prices have also been hiked on an annual basis, INCLUDING those for so called 'connection' charges. These should form part of any review as they provide a 'back door' for providers to shift cost reductions in one area to another which is not controlled

**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.:**

see answer to 8.5

**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.:**

yes

**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.:**

yes, but with a maximum of 6 weeks.

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

No.