

John Geddes Response

VOLUME 1: Question 3.1: Do you agree with our proposed product and geographic market definition?

Question 3.2: Do you agree with our proposal that BT holds SMP in the supply of WLA products in the UK excluding the Hull Area?

Question 5.1: Do you agree with our proposed general remedies?

Question 6.1: Do you agree with our proposals for access regulation in respect of LLU, SLU and VULA?

Your document appears silent on the issue of UPLOAD speed to be specified for the price-capped 40Mbps product. Upload speed matters - for video conferencing, and critically in the ability to setup (and to a lesser extent, maintain) cloud backup services - and the lowest-upload-speed 40Mbps product (40/2) would see a domestic consumer waiting many days before a Cloud storage service had made an initial backup of their system. PLEASE make sure that you are specifying at least 10Mbps upload (and preferably 20Mbps upload) in the price-capped specification

Question 7.1: Do you agree with our proposal to impose a quality of service SMP condition?

Question 8.1: Do you agree with our proposals for the price regulation of VULA? Please provide reasons and evidence in support of your views.:

Question 9.1: Do you agree with our proposals for the price regulation of LLU and SLU?

Question 10.1: Do you agree with our proposals for BT's regulatory financial reporting?

VOLUME 2: Question 2.1: Do you agree with our proposal to impose an inflation indexed price cap, with CPI as the relevant measure of inflation?

Question 2.2: Do you agree with our proposal to use CCA FAC to establish the cost base for WLA services and to use LRIC+ to estimate the costs of MPF services and 40/10 GEA services?

Question 2.3: Do you agree with our proposal to apply the anchor pricing principle by means of an ongoing copper network with an FTTC overlay?

Question 2.4: Do you agree with our proposal to set charge controls for MPF and 40/10 GEA services that expire on 31 March 2021?

Question 2.5: Do you agree with our proposal to use a one-year glidepath to align charges with costs in 2019/20 for these charge controls?

Question 3.1: Do you agree with each of our proposals in relation to the design of charge controls for BT's LLU and GEA services?

Question 4.1 Do you agree with our proposed conceptual modelling approach?

Question 4.2: Do you agree with our proposed approach to forecasting service volumes?

Question 4.3: Do you agree with our proposed top-down cost modelling for MPF services?

Question 4.4: Do you agree with our proposed bottom-up cost modelling for GEA services?

Question 4.5: Do you agree with our proposed approach to calibrating the bottom-up model?

Question 4.6: Do you agree with our proposed approach to estimating input price inflation? If not, what alternatives would you propose and why?

Question 4.7: Do you agree with our proposed approach to estimating AVEs and CVEs? If not, what alternatives would you propose and why?

Question 4.8: Do you agree with our proposed approach to setting efficiency target? If not, what alternatives would you propose and why?

Question 4.9: Do you agree with our proposed approach to forecasting and attributing BT's cumulo costs?

Question 4.10: Do you agree with our proposed approach to the treatment of future profit and losses from the sales