Your response

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Question 4.1: Do you agree that if BT's migration to an IP network is unpredictable, it could result in increased charges for providers routing calls to its network? Are there any other issues that might arise as a result of its migration?	Confidential? – N We would put it stronger than could result in increased charges. BT's past behaviour has been such that they have taken any opportunity to increase deregulated charges, e.g. Transit and conveyance, by significant amounts. If CPs dismantle their TDM assets and there are delays the CPs may not have the capacity to handle all the TDM traffic
Question 4.2: Please state which of these measures you consider would be appropriate for securing efficient migration and why?	Confidential? – N We would prefer the combination of options as per 4.19. The mandated pace of migration would have to be realistic with an allowance for unforeseen delays and proper testing of capacity.
Question 4.3: Would the regulation of charges for media conversion, switching and conveyance for calls routed via IP networks be an effective means of preventing excessive charges and promoting an efficient migration to IP?	Confidential? – N The regulation of charges would be vital to prevent excessive charges but on it's own would not necessarily promote efficiency, there would need to be regulatory oversight of the implementation timetable
Question 4.4: Do you agree that it remains appropriate that telecoms providers maintain their discretion to designate a single POI at which the FTR will apply?	Confidential? – N We don't have a view on this
Question 4.5: Do you agree with our assessment about how BT's market position in relation to interconnection might change during migration to IP?	Confidential? – N While we are in general agreement with OFCOM's assessment, we have a concern that while BT may no longer have SMP it might still have a dominant market position
Question 4.6: Do you agree that there is unlikely to be a need to impose regulation on BT's interconnection circuits once migration to IP is complete?	Confidential? – N We understand OFOCM's view but we would want to see a further review and consultation before regulation of interconnect circuits is ceased.
Question 4.7: Do you agree that we should continue to regulate BT's TDM interconnection circuits as the industry migrates from TDM to	Confidential? – N We consider it vital that regulation of TDM

IP based networks?	Interconnect circuits continues during the migration to protect and maintain services during the migration
Question 4.8: Do you agree that it would not be necessary to impose regulation on interconnection circuits at BT's IP network during migration?	Confidential? – N It is essential that the migration is carried out fairly to protect CPs in the transition from TDM to IP and we see regulation as the only safe way to ensure this.
Question 5.1: Do you agree that BT's role is less central to the provision of end-to-end connectivity and that telecoms providers now have a choice of transit providers with whom they can interconnect?	Confidential? – N We feel that BT's role in End to End Connectivity is still significant. The majority of CPs still interconnect with BT only so even where a CP offers Transit services they still have to use BT's transit services with consequent higher costs.
Question 5.2: How might the transition to IP networks change the pattern of interconnection and how might this affect how E2E connectivity is achieved?	Confidential? – N BT may have a smaller role but it will still be significant. Direct interconnection will be made easier but only where the levels of traffic are enough it make it worthwhile.
Question 5.3: Do you agree that General Condition A1 is sufficient to ensure that telecoms providers can obtain interconnection and that additional access obligations may no longer be required to ensure end-to-end connectivity? If not, please explain why and what obligations you think are necessary.	Confidential? – N GC A1 on it's own will not be sufficient to ensure that CPs can obtain interconnection. This needs to be supported by a rigorous and speedy enforcement process.
Question 6.1: Do you agree with our initial view that a lack of standardisation of IP interconnection may give rise to a risk of consumer harm?	Confidential? – N Yes
Question 6.2: To what extent is there divergence among telecom providers in respect of the IP standards they are using? Do you consider a lack of standardisation of IP interconnection to be (or likely to be) an isolated issue or more widespread, which may require an industry-wide solution?	Confidential? – N We don't have full sight of the divergence in IP standards. As stated by OFCOM, lack of standardisation will result in increased costs and reduced quality of service as CPs, particularly the smaller TNOs try to manage a variety of protocols. There is an absolute requirement for standardisation to enable CPs to run efficient networks
Question 6.3: What measures, if any, do you	Confidential? – N

consider may be appropriate to address risks arising from a lack of standardisation of IP interconnection?	There needs to be an enforced set of standards, similar in operation to those for TDM interconnect, to give certainty to CPs wishing to interconnect with more than one other CP.
Question 6.4: Would it be useful to consider the case for intervention in relation to technical standards for interconnection ahead of our next market review?	Confidential? – N We don't feel that the case for intervention needs to be considered, with no compulsion to comply with UK wide standards many CPs will simply ignore them and this could lead to anti competitive behaviour
Question 7.1: What are your views on the factors that we have highlighted as having a bearing on the setting of termination rates? What other developments should we consider?	Confidential? – N The Comments in the consultation are a good summary of the factors. We would however question the comments about Artificially Inflated Traffic. AIT depends on service charges rather than termination rates which are not high enough to warrant the amount of work required for AIT and are unlikely to become that high. As the costs of providing services on mobile phones decrease we would hope that OFCOM encourages a reduction in Access charges, in particular those raised by the mobile operators, our experience is that they are a significant contributory factor in bill shock experienced by consumers, being up to ten times the service charge.
Question 7.2: What are your views on the options we present for regulating the fixed and mobile call termination markets? Which appears to be the most appropriate regulatory option?	Confidential? – N We feel that LRIC is the most appropriate regulatory option, giving consistency and a standard that most CPs understand.