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### **Measures to support Openreach's trials in Salisbury and Mildenhall**

BT welcomes the opportunity to contribute to Ofcom's consultation, *Measures to support Openreach's trials in Salisbury and Mildenhall*. We welcome these trials as a way of testing how best to smoothly migrate customers to full fibre services (in Salisbury); and to withdraw Wholesale Line Rental (WLR) while migrating customers to replacement services (in Mildenhall).

The Government's Future Telecoms Infrastructure Review recognised that running two networks in parallel is both costly and inefficient. Ofcom has also previously noted on the Salisbury trial that "uncertainty about how long it (Openreach) will have to run both copper and fibre networks in parallel is a potential risk to its investment case in full fibre".

Question 1: Do you agree with our proposals to waive the non-discrimination, Equivalence of Inputs and VULA charge control obligations to facilitate Openreach's trials offer? Please give reasons for your answers.

We support regulatory measures which are likely to promote consumer and business take up of full fibre broadband and All-IP voice products. We also support the proposed changes to Openreach's regulatory obligations as they could enable Communications Providers (CPs) to offer fibre products at attractive prices to customers. We would expect this to lead to faster migration off legacy copper networks in the trial areas, in turn resulting in faster take-up of full fibre services.

We welcome the approach to geographic pricing where Ofcom is proposing to define the geographic scope of the proposed consents and direction by reference to areas currently served by the Salisbury and Mildenhall exchanges (and their copper access networks.) As part of the forthcoming Fixed Access Telecommunications Market Review and for the reasons set out for this trial, Ofcom should consider greater pricing flexibility on an exchange by exchange basis as Openreach migrates customers away from the PSTN.

Question 2: Do you agree with our assessment of the impact of our proposals? Are there any further impacts that we should consider?

Openreach stated in its 21 March 2019 consultation with regards to its proposed voice-only data service the following:

*As part of our WLR withdrawal plans, we are talking to industry about having a low bandwidth fibre product available at voice economics.*

Subsequent to this, in its September 2019 Statement, Openreach added:

*the low bandwidth fibre products will be 500kbit/s symmetric which should enable CPs to provide high quality voice calls and key features like 3 way calling. Early indications are that Openreach will be in a position to launch these products in Q1/Q2 2020 which would provide CPs adequate time to consume the product and develop their products before stop sell implementation.*

Ofcom should note that under the terms of Openreach's proposals, an additional overlay voice IP product will be required by BT to replicate the existing WLR service. This could potentially introduce a new cost into the provision of voice services. These costs and any customer implications will need to be assessed. This will include an assessment of pricing for voice products to ensure that BT can continue to appropriately meet the needs of its voice-only customers at a fair price.

We believe that a 'customer charter' as proposed in our response to Openreach's March 2019 consultation could be used to protect not only vulnerable customers but also to protect users of low bandwidth broadband services who will have to transition to more expensive FTTP products.

In that context, we look forward to engaging on this and a number of related issues at Openreach's WLR Industry Group and separately with Ofcom to ensure we meet our broader obligations as they relate to the provision of voice-only services to our retail customers.

**BT Group**