

## Your response

Question	Your response
<p><b>Question 3.1: Do you agree with Ofcom’s proposal on how to deal with the potential impact of Covid-19 on Openreach’s QoS performance?</b></p>	<p>No.</p>
<p><b>Question 4.1: Do you agree with Ofcom’s proposal to set the FAD standard to require Openreach to offer appointments that are within 12 working days of an order being placed, and that this requirement be met in 89% of instances? Please set out your reasons and supporting evidence for your response.</b></p>	<p>No. Ultimately Ofcom’s proposal degrades delivery of service to our customers and sanctions delays to giving end-users access to communications services, which have become even more vital in the current climate.</p> <p>The justification for this extension appears to be focused on the impact of Covid-19 and the increase in fault volumes for quarter 3 2020.</p> <p>There was understandably a spike in fault reporting during quarter 3 as faults had been under-reported during the period of lockdown when businesses’ premises were not being accessed. The data from this period has not been included in Ofcom’s assessment, which has reviewed the months of June to September only for 2018-2020, does not in our view support the case being made by Openreach.</p> <p>The second period of lockdown across the country has not resulted in a similar reduction in fault reporting. As such, we do not expect fault reporting post-lockdown to spike again in the same way.</p> <p>We do not agree that fault volumes have increased as a result of pro-active repairs as stated by Openreach.</p>
<p><b>Question 4.2: Do you agree with Ofcom’s proposal not to introduce a glidepath to return to a tighter FAD QoS standard?</b></p>	<p>No. We believe that there should be a glidepath to return to tighter restrictions as:</p> <ul style="list-style-type: none"> <li>• The impact of Covid-19, whilst unprecedented, is temporary.</li> </ul>

	<ul style="list-style-type: none"> <li>• Pro-active faults, which Openreach has attributed as one of the causes of the recent fault reporting increase, are being removed from the QoS standard for faults.</li> <li>• As more customers migrate to FTTP and Openreach stop selling WLA services in completed exchanges during this review period, Openreach will have more available resource to dedicate to repairs.</li> </ul>
<p><b>Question 5.1: Do you agree with Ofcom’s proposal to change the definition of Relevant Region in Directions 3 and 4, to align with Openreach’s new operational structure?</b></p>	<p>No. Whilst Ofcom does not consider that adopting the new structure from Openreach would significantly affect its performance in relation to the QoS standards, combining regions, as proposed under that new operational structure, could have a significant impact on a larger proportion of services when situations that allow for QoS standards to be suspended are considered. For example, a high-level MBORC issue affecting 2000 services in North Wales would now result in the suspension of service levels for the entirety of Wales and the Midlands.</p> <p>Given the minimal impact that the change in Openreach’s operational structure has had on its ability to meet the QoS standards thus far (proven by its ability to demonstrate that it has been able to continue to meet the current QoS standards), we do not see a benefit of this alignment that would outweigh the potential adverse implications for customers in the newly combined regions.</p>
<p><b>Question 5.2: Do you agree with Ofcom’s proposal to keep the High-Level MBORC allowance at two regions per year, with a maximum of eight weeks per region?</b></p>	<p>No. Not adjusting the allowance may have greatest adverse impact in the more populous and service intensive regions, e.g. North.</p>
<p><b>Question 6.1: Do you agree with Ofcom’s proposal to amend the definition of a fault, allowing the exclusion of those flagged and agreed by telecoms providers to be resolved</b></p>	<p>We agree that proactively tested and initiated faults should be treated differently to faults reported by end customers and should be</p>

<b>under a separate process as set out in the applicable service level agreement?</b>	subject to different SLAs and under a different process.
<b>Question 7.1: Do you agree with the change of the design of the standard to focus on open orders? Please set out your reasons and supporting evidence for your response.</b>	Confidential? – Y / N
<b>Question 7.2: Do you have any views on the level of the Open Orders Upper Percentile standard? Please set out your reasons and supporting evidence for your response.</b>	Confidential? – Y / N
<b>Question 8.1: Do you agree with the proposed change to KPI (k)?</b>	Confidential? – Y / N