



BT's response to Ofcom's consultation Document

Narrowband Market Review

Further Consultation

Proposed list of wholesale call termination (WCT) providers with significant market power and amendment to wholesale ISDN30 charge control legal instrument.

NON CONFIDENTIAL VERSION

22 September 2017

1. This response is made on behalf of BT Group plc (excluding Openreach) and relates only to the proposed list of wholesale call termination (WCT) providers. A separate response from Openreach will address other aspects to this consultation.

Question 1: Do you agree with our proposals to designate as having SMP the amended list of WCT providers?

2. BT agrees with the proposal to designate communications providers which provide termination of voice calls to United Kingdom geographic numbers as having significant market power in the area serviced by that CP.
3. BT is defined by Ofcom in the Further Consultation as British Telecommunications plc, its subsidiaries and holding companies, and BT's subsidiaries are already caught by Ofcom's proposed SMP remedies in WCT. BT therefore considers it unnecessary and inappropriate to include wholly owned subsidiaries of BT in the annex to section A5 of the consultation.
4. EE Limited, item number 67 within Ofcom's annex is a wholly owned subsidiary of BT. This can be confirmed by reference to page 246 of BT Group's Annual Report 2017¹. BT considers that EE Limited should not be included within the annex to the legal instrument.

End

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http://www.btplc.com/Sharesandperformance/Annualreportandreview/pdf/2017_BT_Annual_Report.pdf