

Consultation response form

Please complete this form in full and return via email to dark.fibre@ofcom.org.uk or by post to:

Georgi Pojarliev
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Consultation title	Dark fibre
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	GTC part of the BUUK Infrastructure Limited Group, which also contains Independent Fibre Networks Limited and Independent Next Generation Networks Limited.
Email address	
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	No
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question 2.1: Do you agree with our findings in relation to product market definition as set out in paragraphs 2.9 to 2.13 of the BCMR Temporary Conditions Statement, namely that we define a market comprising wholesale leased line services of all bandwidths at and below 1Gbit/s using contemporary interface (CI) technologies, including EFM? Please set out your reasons and supporting evidence for your response.	Confidential? – N Yes, we agree with Ofcom's findings regarding the product market definition within the BCMR Temporary Statement.
Question 2.2: Do you agree with our findings in relation to geographic market definition as	Confidential? – N

<p>set out in paragraphs 2.14 to 2.19 of the BCMR Temporary Conditions Statement, namely that we define the following geographic markets: (a) the CLA; (b) the LP; (c) the CBDs of each of Birmingham, Bristol, Leeds, Glasgow and Manchester; and (d) the RoUK excluding the Five CBDs? Please set out your reasons and supporting evidence for your response.</p>	<p>Yes, we agree with Ofcom’s findings regarding the geographic market definition within the BCMR Temporary Statement.</p>
<p>Question 2.3: Do you agree with our assessment of the CI Core, as set out in paragraphs 2.101 to 2.111 of the BCMR Temporary Conditions Statement? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes, we agree with Ofcom’s assessment of the CI Core at current. Furthermore, we believe that additional analysis should be conducted to determine the precise scope of the CI Core.</p>
<p>Question 2.4: Do you agree with our findings that BT has SMP in the markets for Lower Bandwidth CISBO services in the LP, the CBDs of each of Bristol and Manchester and the RoUK excluding the Five CBDs, up to the end of March 2019, as set out in paragraphs 2.20 to 2.100 of the BCMR Temporary Conditions Statement? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes, we agree with Ofcom’s assessment that BT has SMP in all of the identified markets.</p>
<p>Question 3.1: Do you agree with our proposed design of the dark fibre access remedy? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes, GTC believe that Ofcom’s proposed new dark fibre remedy focused on addressing the lower bandwidth CISBO markets will still help GTC to increase the number of new development opportunities where it can deploy its Ultrafast fibre networks. GTC agree that the proposed dark fibre product should result in some small incremental cost reductions when connecting new sites however we are more excited about the potential new efficiencies that can be introduced in the delivery of new sites by eliminating unnecessary active components. To help drive these efficiencies GTC would very much like to see an underground dark fibre demarcation product being made available by Openreach allowing Communication Providers to more effectively interconnect and removing the necessity for further street furniture components where it is not needed and therefore simplifying any street work requirements.</p>
<p>Question 3.2: If BT were to make available a</p>	<p>Confidential? – N</p>

<p>dark fibre product based on the design set out above, how long would it take before your company was in a position to purchase it? From what date would you want BT to make such a product available?</p>	<p>Having no agreed SLAs and SLGs causes GTC some concern as we will not have a full operational understanding of the T2R processes and therefore cannot fully understand the risk profile associated with a site connected using this remedy. GTC are keen to consume dark fibre products but will need to wait to at least 1st October 2018 before a decision is made on if we use the new dark fibre product to connect a new site where we have no alternative connections. In the meantime, GTC will see if the dark fibre product can be used to deliver additional capacity to existing sites where we already have at least one active connection providing resiliency. This will allow us to test performance and processes without putting consumers at risk.</p>
<p>Question 4.1: Do you agree with our assessment of the benefits of our proposed dark fibre remedy? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>GTC agree with Ofcom and feel a new dark fibre remedy will help drive cost reductions and introduce new efficiencies providing GTC a positive alternative remedy to an Ethernet leased line. GTC currently install a high number of 1Gbit/s lease line services and welcome the opportunity to replace these with more efficient and effective dark fibre services. GTC feel that in addition to the cost reductions this new remedy will deliver the following benefits:</p> <ol style="list-style-type: none"> I. Reduce the time to connect a new development site as fewer components are required in the backhaul network. II. Simplify build works as no power will be required at the service demarcation point. This can therefore be located away from a powered central office location. III. Reduce space and power requirements where active equipment are to be installed in cabinets. IV. Reduce the risk of outages by eliminating active components that have a single point of failure associated with them in the data path. V. Simplify demarcation architecture.
<p>Question 4.2: Do you have evidence on the</p>	<p>Confidential? – N</p>

<p>current relative prevalence of each scenario of active equipment configurations as shown in Figures 4.1 and Figure 4.2? Please set out your reasons and supporting evidence for your response.</p>	<p>GTC's current operating model is to use EAD services as defined in Figure 4.2 2a. We believe the proposed dark fibre remedy will allow us to migrate to either Figure 4.2 2b or 2c which will enable us to introduce some of the previously mentioned saving and efficiencies.</p>
<p>Question 4.3: Do you agree with our view, as expressed in paragraph 4.27, that situations where cost savings to providers will be available from dark fibre are likely to be common? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes, if bi-directional fibre working is adopted then savings can be recognised when deploying services on a single dark fibre service.</p>
<p>Question 4.4: Do you agree with our assessment of the risks and costs of our proposed dark fibre remedy? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y/N</p> <p>We agree with Ofcom's assessment that many of the risks identified in the 2016 BCMR are no longer relevant. We do not think the implementation of a dark fibre remedy will reduce competition. We think the dark fibre solution offer greater flexibility to competing providers and will reduce the complexities that providers experience in providing fibre solutions from BT Openreach's network.</p>
<p>Question 4.5: Do you agree that we should impose a dark fibre remedy for the period April 2018 to March 2019? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – N</p> <p>Yes, GTC feel the sooner a dark fibre remedy is made available the better. This will enable Communication Providers to realise new cost and efficiency benefits introduced when using dark fibre connectivity.</p>
<p>Question 5.1: Do you agree with our forecast for dark fibre take-up in 2018/19? Please set out your reasons and supporting evidence for your response, including any volume forecasts you have for consumption of dark fibre for 2018/19.</p>	<p>Confidential? – N</p> <p>Yes, we feel there will be a high churn of active based services to a dark fibre remedy. Key to this will be the SLA and associated SLTs, reasonable service repair targets will need to be agreed.</p> <p>We believe having a robust SLA will be key factor to the wide adoption of the dark fibre product.</p>
<p>Question 5.2: Do you agree with our proposed charge control on the proposed dark fibre product? Please set out your reasons and supporting evidence for your response.</p>	<p>Confidential? – Y/N</p> <p>Whilst we are unable to comment on the data used by Ofcom to undertake their analysis, we agree with the principles underpinning the proposed charge control. These principles appear consistent with those determined in the 2016 BCMR.</p>

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