

Consultation response

<p>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.</p>	<p>Confidential? – N</p> <p>SSEET would agree with the product market definition on dark fibre in the Temporary Conditions Statement, and would also see more benefits if the product came without bandwidth limitation.</p> <p>It's worth to place a temporary conditions statement at present if it will take 18 months for Ofcom to re-approach.</p>
<p>Question 2.2: Do you agree with our findings in relation to geographic market definition as 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>Confidential? – N</p> <p>SSEET would agree with the geographic market definition as specified in the 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>Assuming this is referring to paragraphs 2.1</p> <p>SSEET would agree with the assessment 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>SSEET would generally agree with the finding although clarification on the reference paragraphs is required.</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>SSEET would agree with the design in principle, as it replicates EAD active services, with regards to distance, lead-time, provision processes etc.</p>

	<p>but don't think we will realise the benefit until it is available without bandwidth constraints.</p>
<p>Question 3.2: If BT were to make available a 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>Confidential? – N</p> <p>SSEET would be ready to consume it as soon as it is available, subject to the commercials.</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>SSE would agree with the benefits assessment from the proposed dark fibre remedy. However, the commercial benefit depends on how expensive it will be for Openreach to police the bandwidth. If it's released with original assumed DFA costs (e.g. final reference offer released in Dec 2016) than it will be worth it especially with a view of future upgrades to 10G and the SP managing the NIDs having the end to end visibility of the solution at Layer 2.</p>
<p>Question 4.2: Do you have evidence on the 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>Confidential? – N</p> <p>SSEET are expecting the use of DFA sub 1G will mostly be under scenario 2</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>It depends how expensive it will be for Openreach to police the bandwidth. See answer to question 4.1.</p> <p>If upgrade to higher bandwidth means going to EAD 10G and OSA circuit, the cost benefits will diminish.</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? – N</p> <p>SSEET agrees with the risks for the VHB services being taken out; however, SSEET sees the biggest benefits for our customers on the higher bandwidth services and easy upgrade paths between 1G and higher bandwidths (equipment capability rather than circuit upgrade).</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>SSEET would agree with this approach, our investment has already been made for DFA product development, we are expecting the product launch in an earliest possible date.</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>SSEET would agree with the forecast. SSE would assume majority EAD 1G orders placed as DFA and 73% (as per table 5.2) makes a valid estimation (subject to commercials and based on final reference offer released in Dec 2016).</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? – N</p> <p>SSEET can neither agree or disagree as the question is not clear enough.</p>