

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>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>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>	Confidential? – Y/N
<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>	Confidential? – Y/N
<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>	No. We have 280 exchanges with Openreach and will continue to procure 1G lit services. There is not point using Dark fibre for 1G services – we would only use Fibre for services higher than 1G as we currently do in our back hall networks.
<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</p>	We wouldn't use it as a replacement for 1G EAD

<p>company was in a position to purchase it? From what date would you want BT to make such a product available?</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>NO we do not agree. The industry needs dark fibre for back hall networks NOT end user access. We would prefer it if OFCOM regulated Opreach to sell dark fibre between Datacentres and its exchanges as we could solve the back hall issues we and the industry face. This is where the industry need the service not as another access product to the end user.</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? – Y/N</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? – Y</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>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>We do not agree that there should be a remedy as you have proposed.</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>We do not think there will be an uptake for service providers replacing 1G with Fibre. The cost to implement and manage is not worth it.</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>