FCS Response to the Ofcom Consultation - Upgrading broadband customers to superfast products - Changes to quality of service regulation on Openreach

Introduction

The Federation of Communication Services represents companies which provide professional communications solutions to (primarily) business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio.

Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest national and international private enterprises and public-sector users. FCS is the largest trade organisation in the professional communications arena in the UK, representing the interests of around 300 businesses who supply B2B services nationwide.

Overview

We welcome the Openreach development to offer a lower cost, bulk grouping provision capability to incentivise CPs to move their customer base over more quickly from copper to fibre broadband products. Such discounts offered to CPs must not be volume related and we would expect Ofcom to make it clear that the Openreach discounts received should be passed down through the distribution chain.

Whilst we have no problem with the principle of exempting these specific order journeys from the relevant quality of service regulation, we would expect Openreach to ensure that there will be no adverse impact on business as usual orders from achieving the relevant FAD measures. We are pleased to note that Ofcom intend to monitor the KPI information Openreach has committed to provide voluntarily for the Bulk Grouping provision capability orders. In addition, we would request that Ofcom closely monitor FAD performance across all Fibre provision and to challenge Openreach if there is a drop off in performance during periods of bulk provision.

Conclusion

The FCS supports the proposed changes to quality of service regulation to enable the introduction of Openreach's 'Bulk Grouping provision capability'.