

From: Steve Kerr

Subject: EXTERNAL:Openreach proposed FTTP offer starting 1 October 2021 - FCS response to Ofcom call for inputs 16 July 2021 14:54:12

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Dear Ofcom,

in advance of the formal Ofcom consultation on Openreach's proposed FTTP offer starting 1st October 2021, which we expect to respond to more fully, the Federation of Communication Services (FCS) would like to respond to your initial call for inputs as follows:

FCS key concerns revolve around the fact that volume discounts of this type, potentially favour the incumbents/established market participants who have already established their customer base and product portfolios. This type of offer, by its very nature, automatically disadvantages any new entrants and smaller providers who are looking to challenge the incumbents and seeking to develop and establish an FTTP customer base.

Kind Regards

**Steve Kerr**

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