

**SSE response to consultation on  
Delivering a more independent Openreach**

SSE has concerns about releasing BT from the Undertakings when the BT Commitments do not make reference (other than in an ancillary manner at paragraph 15.1(b)(i)) to the Wholesale Line Rental (WLR) range of products, which are a main focus of the current Undertakings – see for example within the list of products at paragraph 3.1.1 that BT undertakes to provide on an ‘Equivalence of Inputs’ basis.

Many types of CP use the WLR range of products – from those with their own networks in order to provide services in areas where they have not built out their network to those smaller CPs, such as SSE’s Retail business, that are dependent on the wholesale services available to provide their own retail phone and broadband services. There will thus be an interest across the whole market of non-BT fixed line CPs in the maintenance and development of the WLR range of products. The lack of an explicit mention of these products at paragraph 3.2 of the BT Commitments casts some doubt on the intentions of BT Group to have its Openreach subsidiary required to include WLR customers in the Commitments with respect to equal treatment and consultation about product development etc. that are a focus of the Commitments and of Ofcom’s policy for Openreach’s future engagement with the whole of its wholesale customer base.