

Question 1: Do you agree with our revised geographic market definition? If not, please explain why?:

No, it seems to be continuing an incorrect definition of SMP when applied to an exchange.

SMP relates to those cases where a single supplier has X% of the market 'under their control' as such each exchange should be 'inspected' and those that fall below X-5% should be declared open (Market 3 as defined in your documents) those that fall in the range X+5% <> X-5% should be classed in Market 2 and those where X+10% should remain in market 1.

Therefore if X is 60%

55% and less is Market 3

55-65% is Market 2

65%+ is Market 1

To calculate the SMP % the number of ports bought by BT Group PLC companies should be divided by the total (current) ports, this figure should be recalculated on a 6 monthly basis and exchanges reclassified

Question 2: In light of the revised geographic market definition presented in this consultation, do your previous comments on SMP remain appropriate? If not, please explain why?:

Yes, the original and revised models are flawed.

Question 3: Do you have any further comments to add in relation to the SMP assessment?:

No

Question 4: In light of the revised geographic market definition and SMP analysis presented in this consultation, do your previous comments on remedies remain appropriate? If not, please explain why?:

Yes

Question 5: Do you have any further comments to add in relation to remedies in Market 1 and Market 2?:

See previous answers

Question 6: Do you have any further comments to add in relation to the period of notice that should apply to exchanges that move from Market 2 to Market 3?:

See previous answers