

What do you want Ofcom to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1.1: What are the implications of market change for mobile and wireless services?:

To provide a more competitive and innovative market for communications services as a whole

Question 1.2: How are citizens and consumers affected by developments in the mobile sector?:

By the costs they pay, what they can achieve doing them and how easy they are to use

Question 1.3: What are the purposes of mobile regulation, and where should its focus lie?:

Providing a level playing field for all communications services, not just mobile

Its focus should be on making fixed and mobile more competitive, to create a regime with better coverage for the UK with lower pricing.

Question 1.4: What is the scope for deregulation, competition and innovation in the mobile sector?:

You have complete scope to de-regulate termination charges provided you put in a wholesale equivalence layer: e.g. the cost of a wholesale outgoing minute = the cost of a incoming (termination) minute.

This would, in one fell swoop reduce the regulation required in termination. The industry would then have to set the price based on competition and market forces.

Current industry norms such as giving away high price handsets would then have to be rethought by the operators.

Basically the industry has far too higher income for the cost of the service it provides. It needs to realise then and address the large area of costs such as handset subsidy, rather than worry about sharing of infrastructure. Handset subsidy can be >20% of OPEX, running the network <10% opex

Question 3.1: What do you think are the features of a well-functioning mobile market? What evidence do you see that those features are present in the UK market?:

Not giving away hugely expensive handsets such as the N95 to anyone, just to try and prove a 3G business case that doesn't work.

I see little evidence that the operators have any concept of customer value and priority.

The price for basic services such as minutes etc is far too much

Question 3.2: What measures are most appropriate to assess whether the mobile sector is performing well for citizens and consumers?:

Comparison of the cost per minute in the UK vs. America and India

It makes the UK look like a rip off nation (c. 3 times of the US and 10 times of the UK)

Question 3.3: How will market dynamics change as a result of trends such as availability of new spectrum, mobile broadband and new ways of delivering voice services?:

Voice supports mobile broadband - period

Mobile broadband could not exist at the prices offered without most of the infrastructure costs being covered by voice.

Increasing the amount of spectrum available for mobile broadband will have a few effects:

Improving the coverage and in building experience of MBB, but won't generate more revenue per subscriber, this will always be reduces

MBB technologies can provide additional voice capacity, which is always welcome to promote competition. VOIP over a mobile infrastructure is a long way off, it should not be considered a serious technical solution in the medium term

Question 4.1: What is your experience, as an individual consumer or an organisation that uses mobile services?:

Of a fat industry that is geared to dishing out new mobile phones rather than helping control costs

MBB isn't a good consumer experience yet - coverage and reliability is too patch

Question 4.2: How should regulators and policy-makers respond to signs of rising consumer concern? :

They should understand the industry economics before trying to make policy

Then they should implement the wholesale costs = termination cost policy across the industry

They should then sit back and wait for the industry to become more competitive..

Question 4.3: What are the important factors to consider in striking a balance between protecting mobile consumers and enabling markets to work flexibly? Have we got this balance right in today's mobile market?:

Not at all, Ofcom has singularly failed to understand the economics of mobile networks and mobile operations in general.

This has made the toothless when trying to address an industry charging a pound for a service that costs a penny to produce

Question 5.1: How does the use of mobile services affect our participation as citizens in society?:

It makes people more contactable

However it increases pressure and prevents people from relaxing

Question 5.2: What factors should we take into account in thinking about access and inclusion issues in mobile markets?:

Network quality and the cost of handsets. In India they cost 20 USD - why not here?

As far a quality goes, certain areas of the UK do warrant some for of opex access utility network

Question 5.3: What factors should we take into account in thinking about new services, and how those services may affect issues like protection of children, privacy and security?:

IP/Web Services sit outside the mobile domain, don't get confused with basic connectivity services and web based revenue generating services

It is up to the industry to enforce privacy, not the economic regulator

Question 5.4: Have you been affected by issues about coverage or 'not spots'? How has it affected you?:

Yes, the rail network is notoriously under optimised. You can be on a call and it drops, but then you have full coverage again

Operator focus on roads, but don't optimise (using people with monitoring kit) along rail route

I've also tried to have 3G calls around central london and given up because they drop out too much

Question 7.1: What do you see as the most influential trends and features of mobile and wireless markets in future?:

Reduction in calling costs and handset cost

Question 7.2: What new policy and regulatory challenges could the trends identified in this section bring? Which policy and regulatory challenges could they address?:

Implementation of a proper wholesale = termination regime

Question 8.1: Should Ofcom do more to promote competition in mobile and wireless markets?:

Yes, as above, but nothing else, let the market sort out handset costs etc

Question 8.2: Ofcom's strategy in telecommunications is to promote competition at the deepest level of infrastructure that is effective and sustainable. How might this strategy be applied, given future developments in the mobile sector? Under what circumstances, if ever, would it make sense to consider access regulation for mobile platforms?:

As 7.2

You should only consider access regulation if the wholesale = interconnection cost regime doesn't work

Question 8.3: What role can competition play in ensuring that future development of the mobile internet provides an open and flexible environment for a wide range of services? Should Ofcom explore open

access requirements to ensure opportunities for innovation? What role might 'net neutrality' play in the mobile sector?:

Competition is working well, although Ofcom may consider the cross subsidy of voice in 3G services that currently doesn't exist in WiMAX

Question 8.4: What role might competition play in addressing questions about transparency of prices, services and contractual conditions offered to consumers of mobile and wireless services? What role should regulation play in addressing these questions?:

Code of conduct, nothing else

So that consumers can make a decision on a like for like basis

Also make the code of conduct very simple..

Question 8.5: What is the best way to promote content standards and ensure privacy protection for increasingly complex content and transaction services? How will privacy issues fare in a world where services are more personal and more complex?:

By helping the market decide - provide forums etc, do not enforce draconian ideas

Question 8.6: Will the mobile termination rate regime need to evolve or change more fundamentally? What is the best approach to adopt?:

Yes

Wholesale rates = termination rates and you will have solved a lot of problems in one shot

Question 8.7: If competition does not reduce international roaming charges sufficiently, how should regulators respond, if at all?:

Yes - only because a person has no ability to decide on the lowest cost provider for them

Again a wholesale = interconnection principle could work here

Question 8.8: How might universal service and universal access need to adapt in a world where we increasingly rely on mobile services? What role might mobile play in universal access delivery in future?:

Give it up - it is a hugely expensive problem providing a very limited benefit

Question 8.9: Can markets and commercial agreements address issues such as ?not spots? and emergency access?If not, what role might be played by a regulator to address these issues?:

Commerical and technical...

Ofcom should keep its nose out

Question 8.10: How might access for particular groups (such as the elderly and disabled users) need to evolve in future? What role can competition play in addressing these questions?:

One hopes the industry is big enough to incorporate users of particular groups

Question 8.11: Do you have any comments regarding our proposed way forward and the objectives of the next phase of this Assessment?:

Get on with it

Additional comments: