

Question 1: What are your views on the continued relevance of Ofcom's three-year strategic framework for its work in 2008/09?:

Friends of the Lake District (FLD) are a registered charity, established in 1934, with the aims of protecting and conserving the landscape of the Lake District and Cumbria. FLD believes that it is essential that Ofcom should have due regard to the effect on the environment of all its actions and should make specific reference to its statutory duties to designated landscape areas as outlined in the Defra guidance note published in 2005. (Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads). A particular concern, especially in designated areas, is the visual impact on the landscape of Openreach overhead wires and poles, cell phone masts, microwave towers and equipment boxes.

Specifically we believe that Ofcom's strategic framework should include an element on sustainable development to reflect both its statutory duty to the environment and to spell out how Ofcom will undertake all its functions in such a manner as to contribute to the achievement of sustainable development.

Question 2: What are your views on Ofcom's proposed policy work programme and top priority areas for 2008/09?:

The majority of electricity distribution companies (DNOs) have taken up the Ofgem undergrounding allowance that was enabled through that industry's most recent distribution price control review. As we have noted previously if Openreach was provided with a similar allowance it would be to the benefit of some of our most valued landscapes. In addition joint schemes with DNOs, e.g. joint trenching could save costs and thus provide benefits to consumers in both visual and cost terms.

A top priority for FLD would be the introduction of an allowance for fixed telecoms similar to that available to DNOs. We are not asking for more intervention or regulation but rather that Ofcom, as the regulator of Openreach, provides incentives to enable lines to be placed underground in National Parks and AONBs in the same way that Ofgem has acted in regulating the electricity industry. From discussions with Ofcom representatives we understand that the most relevant mechanism to take this forward would be a review of BT's network charge controls. We note that in the document on 'Monitoring compliance with charge controls' that the expected review of network charge controls is 2009. We would hope that an investigation of, and recommendations for, such an allowance would be included within this review.

In preparing for next generation core and access networks we believe that a policy commitment should be made to ensure that old and redundant infrastructure is removed as it is replaced by new technology.

Ofcom emphasises the need to identify the interests of both consumers and citizens. We believe that this should go beyond questions of convergence and competition (para 3.12). As noted in our response to the 2007/08 Annual Plan FLD believes that increasingly members of the public seek benefits to be measured not only in terms of choice, keen prices, reliability and network coverage, but also to take account of environmental impacts. Thus we believe that Ofcom should engage with all its

stakeholders on environmental issues e.g. include questions on undergrounding overhead telephone lines to reduce visual impact in future research with consumers.

Question 3: Are there new or additional areas in which Ofcom should consider reducing regulation and work to minimise administrative burdens? Please provide specific examples.:

No comment.

Question 4: Are there additional areas of international policy development that Ofcom should be contributing to? Please provide specific examples.:

No comment.

Additional comments: