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

We believe that the headings set out in the strategic framework continue to capture the correct areas of focus for Ofcom activity

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

We welcome the development in Ofcom's proposed plan of highlighting the dozen or so 'top priority' areas for the years ahead and the transparency that this provides to Ofcom's stakeholders. We recognise that Ofcom's resources may need to be re-prioritised due to unforeseen developments but clarity over where the priorities lie should enable stakeholders to expect progress on these identified areas, at least.

With our background in providing retail communications services, the following stated priorities are of particular interest to us.

- Developing and enforcing consumer empowerment and protection policies

We believe that the project under this heading on switching and mis-selling is the single most important area of Ofcom's work with respect to the retail communications market. We agree that there is detriment to customers in the present set of uncoordinated switching processes, some of which require end customers to make a number of different contacts with their existing provider, particularly where ?bundles? of services are involved. The situation also represents a barrier to entry and is likely to get worse with the trend towards further convergence and bundling of products and services. We urge Ofcom to move to the implementation stage of this project as quickly as possible and to consider the benefits that an industry-owned process to maintain and develop the arrangements would bring.

- Preparing for next generation core and access networks

We fully support Ofcom's emphasis on promoting competition at the heart of the developing regulatory framework for mass-market roll-out of next generation access (NGA) networks. We believe that this should fully encompass competition at the retail as well as the infrastructure level and that end users on NGA networks should not be locked in to particular retail services. Otherwise, in our view, the sorts of issues that have emerged recently with respect to broadband switching and contributed to the consumer detriment driving the switching project mentioned above, will re-occur in the NGA context.

- Implementing the strategy for fixed line telecoms

We agree that continuing focus on the compliance by BT Group with the Undertakings is important. The recent dispute between Openreach and other communications providers (CPs) on the payment of compensation by Openreach for failures to provide agreed service levels illustrates that there are still inadequacies in the services provided by BT Group to other CPs and, as Ofcom has noted, that this matter raises 'both competition and equivalence issues'. We believe there should be

no further deregulation of BT in this market until Ofcom is satisfied that no valid issues raised by CPs remain outstanding.

- Engaging in the development of new EU legislation

We support Ofcom's involvement with the developing EU framework affecting communications networks and services. In particular, we believe Ofcom should look to ensure that the EU-based framework for market reviews, when applied to the UK, does not lead to perverse effects on retail competition. In particular, the reseller business model, which has been encouraged in recent years, should be considered and protected in market reviews.

We are also interested in and support Ofcom's work to develop competition in other areas such as pay-TV and the mobile sector.

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.:

We believe there is scope to reduce the burden of prescriptive regulation represented by detailed mandatory guidelines for codes of practice such as those required under General Condition 14, which has actually grown since this time last year. We understand that this is being addressed in Ofcom's review of General Conditions. This project has been mentioned in a number of Ofcom documents over the last 18 months or so and we look forward to seeing more information on Ofcom's thinking in this respect.

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

See comments on EU legislation in response to question 2 above.

Additional comments: