

**Name and title under which you would like this response to appear:**

Alan Danbury

**Representing:**

Self

**Question 1: When do you consider it would be timely and efficient for next generation access investment to take place in the UK?:**

Given the scale of the task, and the likely problems to be resolved, planning should start now, with implementation starting in 2008.

**Question 2: Do you agree with the principles outlined for regulating next generation access?:**

**Question 3: How should Ofcom reflect risk in regulated access terms?:**

It has been noted that certain areas ( typically higher populations) will be more likely to provide a better financial return. It may be necessary to "persuade" operators to upgrade other areas by allowing higher returns to reflect the greater financial risk.

Consideration should also be given to why the typical prices in UK appear to be significantly higher than the equivalent services in other countries. Is this a reflection of addition risk, which could be reduced by an alternative regulatory regime, or profiteering?

**Question 4: Do you agree with the need for both passive and active access remedies to promote competition?:**

All and any options should be promoted to provide an improved service to all customers.

**Question 5: Do you consider there to be a role of direct regulatory or public policy intervention to create artificial incentives for earlier investment in next generation access?:**

Consideration should be given to upgrading rural areas or other where existing services are speed limited for technical reasons in advance of upgrades to highly populated areas. This would assist rural businesses and others who are currently disadvantaged by the lack of facilities. This would have benefits in enabling more rural employment, and reducing traffic congestion.

Service providers should be encouraged to provide FTTC as a way of bringing existing rural provision up to an adequate level. If FTTH is being encouraged on all new housing developments, there should be incentives to upgrade to FTTC for

existing customers in the same area as economies of scale can be made when installing fibre to reach the area.

**Additional comments:**

Whilst a large number of those surveyed may not be aware of their download speeds, or capacity limits, and may not currently use bandwidth intensive services, this may be because they have tried them and they do not work over the current infrastructure. Providing medium/high speed services ( say 10-25Mbps) would encourage the use of additional services. Currently for most users, broadband is not a practical alternative to other forms of digital service delivery. Although a relatively high penetration of digital TV may have been noted, in most houses there will still be several analogue TV's as well as one digital one.