

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Valuing Copper Access

To (Ofcom contact): Graeme Hodgson

Name of respondent: Nancy Saunders

Representing (self or organisation/s): Kingston Communications (Hull) Plc

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input type="checkbox"/>	Name/address/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input checked="" type="checkbox"/>	If there is no separate annex, which parts?	

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DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Graeme Hodgson
Competition and Regulation
4th Floor
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Chalfont Grove
Narcot Lane
Gerrards Cross
Bucks
SL9 8TW
Telephone (01494) 878016
Mobile (07779) 301718

Your Ref:
Our Ref: NJS/Sub/NVS

Dear Graeme,

Next Generation Networks

Kingston Communications (Hull) Plc (Kingston) welcomes the opportunity to respond to the consultation regarding valuing copper access. As Kingston has its own copper access network within the Hull area we are therefore well placed to give you the benefit of our experience in this area.

Kingston supports the submission made by UKCTA overall, however Kingston would take this opportunity to submit additional information and concerns over and above that response.

Executive Summary

There are three main points that Kingston seeks to bring to your attention:

1. Kingston agrees with Ofcom and UKCTA that there should be no requirement for Kingston to undertake a copper valuation exercise.
2. Kingston encourages Ofcom to use a robust methodology to ascertain the value of BT's copper access network, preferably based on HCA.
3. Kingston has direct experience in the creation and maintenance of a copper access network and attaches a confidential annex containing labour costs.

We have taken each of these issues in turn and explored each concern in some detail below.

Extension of the Consultation to include the copper access network operated by Kingston within the Hull area.

At this time, Kingston has not made available any of the copper access products required to be made available following reasonable request where Kingston was found to have significant market power within the Hull area. This is for various reasons including that no reasonable request has been received, or that product requirements are under negotiation. Therefore it would seem to be unreasonable to extend the current consultation to cover Kingston's copper access network at this time.

Methodology used to arrive at the value of BT's copper access network.

Kingston is extremely concerned that Ofcom is being unduly influenced by a desire to reduce the costs of products that use the BT copper access network. Kingston urges Ofcom to be rigorously objective in the assessment of the copper access network and to use a robust methodology that would withstand scrutiny.

Kingston believes that a methodology based on the HCA method would be the most appropriate way forward as any CCA method, whether optimised or not relies more upon assumptions than actuality.

Labour Costs.

Kingston attaches a confidential annexe that lists labour rates from a number of our contractors.

Should you have any questions relating to this submission or require any further information on any of the above, please do not hesitate to contact me.

Nancy Saunders
Regulatory and Interconnect Manager