

Question 12.2: Do you agree with the remedies that we propose for BT in the WCT market? Please provide reasons and evidence in support of your views

We are fully in agreement with the remedies for BT, in particular providing network access on reasonable request, charge controls and reference offers. Our experience is that where there is little or no competition, BT will increase uncontrolled charges to unaffordable levels. Reference offers will aid transparency and make it clear what terms and conditions are being applied to all.

Question 16.1: Do you agree with our approach to the regulation of interconnection? Please provide reasons and evidence in support of your views.

We feel that regulation of Interconnection is very necessary. We and many other CPs need the support of regulation to ensure that our businesses are able to obtain regulation, we have little confidence that Interconnection would always be provided on reasonable non discriminatory terms if regulation were to be removed. We would not want BT to be in a position to discriminate between CPs by providing interconnect circuits to some CPs on less attractive terms than others, we have concerns that BT would use this ability to deter some CPs from interconnecting with BT. We do not agree with BT's view that the OFCOM dispute process will be able to resolve issues. It is difficult to raise issues that qualify for the dispute process and even if they did OFCOM would be swamped with the number of disputes. Many CPs have difficulties with Interconnect but cannot afford to take legal action, they would, however, enter into formal disputes.

Question 17.1: Do you agree with the remedies we propose in relation to BT's interconnect circuits? Please provide reasons and evidence in support of your views

We are fully in agreement with OFCOM's proposed remedies, in particular charge controls and reference offers. When transit and conveyance charges were deregulated as part of the NGCS unbundling, BT, contrary to OFCOM's stated expectations, massively increased the charges and changed their structure, to the point where they made some low cost services uneconomic to operate, resulting in increased prices charged to consumers. There is no evidence that the same wouldn't happen to circuit charges.

Question 18.1: Do you agree with our charge controls proposals for BT's interconnect circuits? Please provide reasons and evidence in support of your views

As stated above BT's recent behaviour has demonstrated a very real danger that without charge controls, including caps on price changes, BT would increase prices to the point that some services would not be economical to operate, causing either an increase in the prices paid by consumers or a decrease in the services available to consumers. Were this situation to occur it would be a barrier to entry into the market and discourage innovation.