

**Title:**

Mr

**Forename:**

Ian

**Surname:**

Dillamore

**Representing:**

Self

**Organisation (if applicable):**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

The rollout of an effective Super Fast BroadBand throughout UK, is VITAL for the future prosperity and wellbeing of the UK. More and more industry, and individuals, rely on communicating with businesses and individuals, via Digital communication. The UK MUST be thinking of the next 2 to 3 DECADES requirements, not just the immediate future, if we are to keep ahead of other countries throughout the world.

**Question 1: Do stakeholders agree that promoting effective and sustainable competition remains an appropriate strategy to deliver efficient investment and widespread availability of services for the majority of consumers, whilst noting the need for complementary public policy action for harder to reach areas across the UK?:**

Yes

**Question 2: Would alternative models deliver better outcomes for consumers in terms of investment, availability and price?:**

That depends entirely on what the "alternative models" are. BT are failing to invest sufficiently to meet the requirements of the UK, so we desperately need to have an alternative in place as a matter of urgency. Otherwise the UK will be left behind the digital economy.

**Question 3: We are interested in stakeholders' views on the likely future challenges for fixed and mobile service availability. Can a 'good' level of availability for particular services be defined? What options are there for policy makers to do more to extend availability to areas that may otherwise not be commercially viable or take longer to cover?:**

"Good" level of availability to me, means consistent quality of service, wherever you are in the UK.

**Question 4: Do different types of convergence and their effect on overall market structures suggest the need for changes in overarching regulatory strategy or specific policies? Are there new competition or wider policy challenges that will emerge as a result? What evidence is available today on such challenges?:**

I don't know.

**Question 5: Do you think that current regulatory and competition tools are suitable to address competition concerns in concentrated markets with no single firm dominance? If not, what changes do you think should be considered in this regard and why?:**

BT have too much dominance and can manipulate the market to suit their own shareholders short term benefit. BT should be split from Openreach for a start. Other newer Companies, with Superfast technology should be encouraged with subsidies to become more active and allowed to compete with BT on an even field.

**Question 6: What do you think is the scope for sustainable end-to-end competition in the provision of fixed communications services? Do you think that the potential for competition to vary by geography will change? What might this imply in terms of available regulatory approaches to deliver effective and sustainable competition in future?:**

Don't know.

**Question 7: Do you think that some form of access regulation is likely to continue to be needed in the future? If so, do you think we should continue to assess the appropriate form on a case by case basis or is it possible to set out a clear strategic preference for a particular approach (for example, a focus on passive remedies)?:**

A clear strategic policy should be put in place now, and strictly enforced by means of strong regulations.

**Question 8: Do you agree that full end-to-end infrastructure competition in mobile, where viable, is the best means to secure good consumer outcomes? Would alternatives to our current strategy improve these outcomes, and if so, how?:**

I don't know.

**Question 9: In future, might new mobile competition issues arise that could affect consumer outcomes? If so, what are these concerns, and what might give rise to them?:**

In the future, the mobile market will undoubtedly change. Any regulations in place now, should take that into account so that they can be amended in line with current practices and technology.

**Question 10: Does the bundling of a range of digital communications services, including some which may demonstrate enduring competition problems individually, present new competition challenges? If so, how might these issues be resolved through regulation, and does Ofcom have the necessary tools available?:**

Ofcom does not currently have sufficient "teeth" to enforce or ensure that competition in the digital communication services is fairly distributed.

**Question 11: What might be the most appropriate regulatory approaches to the pricing of wholesale access to new and, risky investments in enduring bottlenecks in future?:**

A flexible regulatory approach is need to take account of different marketing conditions in more risky ventures. Assessing the risks and encouraging new ventures by subsidies.

**Question 12: How might such pricing approaches need to evolve over the longer term? For example, when and how should regulated pricing move from pricing freedom towards more traditional charge controls without undermining incentives for further future investment?:**

I have no feelings for the pricing side of the market.

**Question 13: Are there any actual or potential sources of discrimination that may undermine effective competition under the current model of functional separation? What is the evidence for such concerns?:**

Not sure.

**Question 14: Are there wider concerns relating to good consumer outcomes that may suggest the need for a new regulatory approach to Openreach?:**

Openreach are currently part of BT, so are responsible ultimately only to BT. This is totally unacceptable in the existing market conditions and must change. If necessary, by means of splitting Openreach into a separate and independent Company.

**Question 15: Are there specific areas of the current Undertakings and functional separation that require amending in light of market developments since 2005?:**

The technology has moved on so fast since 2005, and will continue to develop over the next decades. Therefore, the existing market conditions, suitable in 2005, must be changed to allow for quicker, more flexible and effective introduction of new technology. More effective competition to BT would be a start.

**Question 16: Could structural separation address any concerns identified more effectively than functional separation? What are the advantages and challenges associated with such an approach?:**

Not sure.

**Question 17: What do stakeholders think are the greatest risks to continuing effective consumer engagement and empowerment?:**

Threats made by BT to curtail their future funding of SuperFast BroadBand, if Ofcom and the Government split up their monopoly position. The UK CANNOT exist and develop its digital infrastructure to compete with other countries and markets, under the continuing threat of the major monopoly Company.

**Question 18: What indicators should Ofcom monitor in order to get an early warning of demand-side issues?:**

Listen to what the Customers are saying! Develop a Website which can be easily accessed so that complaints can be quickly highlighted and suitable actions taken.

**Question 19: What options might be considered to address concerns about consumer empowerment at each stage of the decision-making process (access, assess, act)? What more might be required in terms of information provision, switching and measures to help consumers assess the information available to them? What role may Ofcom have to play compared to other stakeholders (including industry)?:**

As above, a suitable "Customer based" website, which can be promoted and advertised by Ofcom.

**Question 20: Are there examples in competitive or uncompetitive sections of the market where providers are not currently delivering adequate quality of services to consumers? What might be causing such outcomes?:**

Look at the Connecting Devon and Somerset results! BT are the ONLY provider and results are abysmal .

**Question 21: What further options, if any, should Ofcom consider to secure better quality of service in the digital communications sectors?:**

As above, encourage more competition, take away BT Monopoly position, plan for the next decades, rather than the foreseeable future. Providing 2Mbps, and calling it Superfast broadband, is NOT going to be acceptable in one years time, let alone a decade! Most other countries would not consider calling it SuperFast if it is less than 30Mbps Upload AND download .

We should be aiming to supply every household with Gbps.

**Question 22: Might there be future opportunities to narrow the focus of ex ante economic regulation whilst still protecting consumers against poorer outcomes?:**

Not sure.

**Question 23: Where might future network evolutions, including network retirement, offer opportunities for deregulation whilst still supporting good consumer outcomes?:**

Not sure.

**Question 24: What are the potential competition and consumer protection implications of the rise of OTT services? Might the adoption of such services enable future deregulation without raising the risk of consumer harm?:**

Not sure.

**Question 25: Are there any areas where you think that regulation could be better targeted or removed in future? What would be the benefit of deregulation as well as the main risks to consumers and how these could be mitigated? Please provide evidence to support your proposals.:**

Not sure.