

## Your response

### Zero-rating

Question	Your response
Question 1: Do you agree with our assessment of zero-rating offers and our proposed approach?	No comment
Question 2: Do you agree with the criteria we use to define Type One, Type Two and Type Three zero-rating offers and our proposed approach to such offers?	No comment
Question 3: Do you agree with the approach in our guidance in Annex 5 in relation to zero-rating?	No comment
Question 4: What are your views on whether zero-rated content should be able to be accessed once a customer's data allowance has been used up?	No comment
Please provide any further evidence you have to support your responses.	

### Traffic management

Question	Your response
Question 5: Do you agree with our assessment of retail offers with different quality levels and our proposed approach?	No comment
Question 6: Do you agree with the approach in our guidance in Annex 5 in relation to differentiated retail offers, including transparency requirements, improved regulatory monitoring and reporting of retail offers with different quality levels as well as	No comment

the general quality of the internet access services?	
Question 7: What are your views on a more permissive approach towards retail offers where different quality levels are content and service specific?	No comment
Question 8: Do you agree with our assessment of how traffic management can be used to address congestion and our proposed approach?	No comment
Question 9: Do you agree with the approach in our guidance in Annex 5 in relation to the use of traffic management to address congestion, including transparency requirements, improved regulatory monitoring and reporting of general network performance metrics, the use of traffic management and the impact on service quality?	No comment
Question 10: What are your views on a more focused approach to traffic management to address congestion?	No comment
Please provide any further evidence you have to support your responses.	

## Specialised services

Question	Your response
Question 11: Do you agree with our assessment of specialised services and our proposed approach?	No comment
Question 12: Do you agree with the approach in our guidance in Annex 5 in relation to specialised services, including transparency requirements, improved regulatory monitoring and reporting of the need for optimisation of a service, the general performance of internet access services and the impact of specialised services on the quality internet access?	No comment

Please provide any further evidence you have to support your responses.

## Scope of the net neutrality rules, terminal equipment and public interest exceptions

Question	Your response
Question 13: Do you agree with our assessment of the terminal equipment rules and our proposed approach?	No comment
Question 14: Do you agree with our assessment of internet access services provided on aeroplanes, trains, buses and coaches and our proposed approach?	<p>No. The Ofcom response is not matching the scale of the enhanced mobile broadband coverage challenge.</p> <p>The heart of the issue is everyone trying to drive unlimited data over an inherently bandwidth limited medium <u>across an entire country</u>.</p> <p>The net neutrality debate tends to pivot on “large CAPs cost savings versus MNOs revenue loss”. That is a false debate. It should pivot around the consumers’ needs.</p> <p>Ofcom elected not to impose a 5G coverage obligation on the frequencies being released to roll out fast 5G (5G@mid band). Where this decision leaves the country is that:</p> <ul style="list-style-type: none"><li>• The MNOs will deliver fast 5G over the commercially easy parts of the UK to cover.</li><li>• <i>Ofcom’s regulatory policy choices (and those of the government) will determine how far fast 5G will extend over the rest.</i></li></ul>

Net neutrality policy set out to maximise the choice of video content for all consumers. However, consumers on the move are effectively being cut out of having any choice. The reason is the absence of fast 5G coverage providing the necessary supporting mobile data capacity.

Ofcom makes it clear in the consultation document that it is minded not to seek powers for a charging regime on large CAPs. That is to discard one of the few potential levers Ofcom has at its disposal to discharge its duties to large numbers of consumers on the move to have any choice of video content.

The lead time for Ofcom to be given new powers is so lengthy that now is the time for Ofcom to make its recommendation to government.

My advice is that the enhanced mobile broadband coverage challenge is so huge that Ofcom can't afford not to move now so as to have ready all of the potential policy levers – including Large CAPs paying a fair and reasonable carriage fee for their video streams to be transported across UK mobile networks.

A document attached sets out the evidence in the form of an analysis of the adverse consequence of the inadequacy of the current proposal. Hopefully, Ofcom might reconsider its decision in the light of this new information.

<b>Question 15: Do you agree with our proposed approach to emergency 999 communications services and that we should consider amending the GCs to achieve this?</b>	No comment
<b>Question 16: Do you agree that ISPs should be allowed to block scams and fraudulent content and provide in-network parental controls and content filters?</b>	No comment
<b>Please provide any further evidence you have to support your responses.</b>	