

## **RESPONSE TO OFCOM'S PLAN OF WORK 2021/22**

The following responses / comments only relate to Telecoms issues.

### **Investment in strong, secure networks.**

Paras 3.5 and 3.6

The access across the UK to full fibre in May 2020, was stated to be 14%.

This result indicates the massive investment and manpower requirements to install full fibre to reach 100% by 2025 from all existing and new suppliers.

CONSUMERS MUST HAVE ACCESS TO THE ROLL OUT PLANS ON AN EXCHANGE BY EXCHANGE AREA BASIS TO ALLOW THEM TO MAKE THEIR FUTURE DECISIONS.

Paras 3.7 AND 3.8

Will be extremely important on the implementation of full fibre, mobile and security regulations.

I do not support the access to Openreach'd ducts and poles from a security and resilience issues.

At the recent Ofcom presentation of their '2021 / 2022 Work Plan' there were many questions on how Ofcom were to monitor 'resilience' on supplier networks. In one reply from Mr B Dick (Scottish Director Openreach) provided detail on "adding increased capacity in 'backhaul' network" for areas in Highlands and in Shetland. I would consider the 'backhaul capacity' is the area that Ofcom will need to direct their monitoring work.

As full fibre to the premises programme is rolled out, the 'distance from the exchange for broadband speeds' becomes irrelevant in a local exchange area. the capacity of the network, its security and resilience becomes very important to broadband speeds reducing during busy periods.

Historically, Scotland had a poor record for the implementation of "Local Loop Unbundling" (LLU). Only 311 exchanges were available for other Operators to provide broadband services. These exchanges were enabled with "21 century network WBC" functions, 746 exchanges were not enabled with this standard of network. I have always wondered whether this legacy will have future implications on security, resilience and 'backhaul capacity' in Scotland's networks.

### **Getting everyone connected.**

Paras 3.9 and 3.10 - Fully support these statements.

Para 3.13 - Moving to digital lines.

Extremely important, but more clarity is required on how the transition is to be implemented once an exchange area has full fibre connections installed.

Spectrum - Fully support the Ofcom statements on this issue.

## **Fairness to Customers.**

Para 3.15 - Agree, a very important issue.

I would wish Ofcom to include 'compensation' for the 'loss of' and 'poor / erratic download' service to be included in 'Fairness regulations'.

In August 2020 I had a situation with Virgin Media on my M100 broadband connection. As my connection is monitored 24/7 via "Samknows" white box, I was able to identify the wide variation on download speeds. The graph was like a 'saw blade' with variations between 112 and 60.8Mb/s over the whole month. Virgin Media replied that they conform to Ofcom's broadband "Speed Code".

For the M100 product the advertised speed is 108Mb/s with an expected range of 108 to 111Mb/s and a minimum guaranteed download speed of 54Mb/s. The latter is half the expected range speed before compensation applies. IS THIS VASTLY REDUCED SPEED FAIR??? Especially when one takes into account the different technology employed by Virgin Media compared to BT network.

In a recent research by 'Uswitch' into switching of broadband it was found that consumers were very reluctant to switch supplier as they feared the loss of their broadband connection for even a few hours or days.

Is it not possible for the new supplier to have their connection fully tested to the premises and then for both suppliers to agree a transfer date?

I note Ofcom's timely Consultation dated 3 February for "Quick, easy and reliable switching". I'm sure the Consultation will be interesting reading on this problem area.

## **Preparing to regulate online harm.**

Not knowing the actual legislation parameters at the moment makes comments on online harms difficult. However, the UK Government's response publication did provide details on pages 8 and 9, items 15, 17 and 19. These outlined the type of companies, online harm framework and seven areas of involvement.

I would fully support the inclusion of "search engines" companies in this legislation and subsequent regulation.