

Non-Confidential



WIGHTFIBRE RESPONSE TO OFCOM'S
CONSULTATION ON ITS PLAN OF
WORKS FOR 2025/26

31ST JANUARY 2025

INTRODUCTION

- 1 Since 2001, WightFibre has owned and operated its' own telecommunications infrastructure. WightFibre provides phone, tv and broadband services to homes and businesses on the Isle of Wight. The WightFibre Gigabit Island Project will see full-fibre broadband deployed to over 70,000 homes and businesses across the Island by 2024. Ultimately the WightFibre network will offer FTTP connectivity to over 80,000 homes in the Isle of Wight.
- 2 WightFibre invests in engagement with Ofcom and government to ensure that policy and regulatory decisions can be evidence-based and taken on a full understanding of the likely intended and unintended consequences.
- 3 WightFibre has reviewed Ofcom's proposed plan of works for 2025/26 and has concerns that it does not accurately represent the level of focus and effort required to ensure that consumers see the true benefits from the significant investments made by WightFibre and other competitive network operators. We set out below some specific comments and requests for Ofcom to increase its focus on fixed telecoms network competition.
- 4 Wight Fibre is a member of INCA and supports INCA's response to this consultation.

WIGHTFIBRE'S COMMENTS AND PROPOSALS FOR OFCOM'S PRIORITIES FOR 2025-2026

- 5 WightFibre is disappointed that the fixed telecoms sector has been represented as a 'maintenance' activity, grouped together with Post and that the complex issues with and services delivered across fixed telecoms networks have been conflated into the term 'internet'.
- 6 Further, whilst WightFibre recognises the importance of the Telecoms Access Review (TAR), which will naturally be a focus for the coming year, it is disappointing to see that there are no workstreams focus on how improvements in regulations and implementation of the Wholesale Fixed Telecoms Market review (WFTMR) can be achieved during the 25/26 year to ensure that the objectives of the WFTMRT are delivered and to create the best possible starting point for the TAR to take effect.

PIA

- 7 In particular, the provisions in the WFTMR relating to the provision of a PIA product that is not unduly discriminatory to the ways in which Openreach itself can access its physical infrastructure (ducts and poles) have not been fully implemented and Ofcom has the opportunity to rectify that during the 25/26 year. One area of particular concern is the heavy administrative burden of consuming the current PIA product. That burden results in increased costs and often long delays in being able to access the infrastructure – it is a burden that Openreach itself does not face and WightFibre would like to see Ofcom acknowledge this

(and other issues of which Ofcom has been made aware through submissions by INCA), it is a burden the cumulative effect of which WightFibre considers results in undue discrimination.

FIBRE TAKE-UP AND AWARENESS

- 8 Ofcom will be aware that take-up of full-fibre services is low in the UK, relative to other countries. Whilst this may be partially due to the deployment of FTTC in the UK before full-fibre deployment, WightFibre believes that it is also due to lack of awareness and a number of market structure issues.¹ Additionally, the take-up on Altnet full-fibre networks is significantly lower than that for the Openreach full-fibre network. This is symptomatic of significant underlying issues in the UK telecoms market and WightFibre believes it is both necessary and appropriate for Ofcom to actively support full-fibre adoption and to investigate what can be done to remedy the disparity between take-up on Altnet and Openreach networks.
1. WightFibre would like to see Ofcom outline a specific work package in this area, including a positive engagement with Building Digital UK (BDUK) to identify initiatives to ensure that public funding delivers the maximum benefits to consumers and taxpayers. Whilst Ofcom is an independent regulator, it is appropriate for it to engage positively with government initiatives that affect the market and to help prevent market distortions from reducing the value of those initiatives.

SUPPORTING ECONOMIC GROWTH

- 9 WightFibre believes that Ofcom should initiate a specific workstream to consult with the sector to identify how the telecoms sector (fixed and mobile) can best assist in the creation of economic growth across the country. This should include assessment of the value of earlier deployment of full-fibre networks by Altnets than if Openreach had remained the only telecoms network operator.²
- 10 WightFibre does not consider the active involvement of an economic regulation such as Ofcom in the creation of economic growth to be undue influence by Government. Ofcom's primary duty is to create a regulatory framework that acts in the interests of consumers and

1 <https://www.ftthcouncil.eu/resources/all-publications-and-assets>

2 Although VMO2 also operates a fixed network, it has historically been a Cable TV network, and it is only being upgraded to full-fibre now due to the competitive pressure from Altnet and Openreach full-fibre deployment. It is widely recognised that the ambitious full-fibre deployment is only happening because of the ever-increasing competitive threat from Altnets.

citizens. One means of delivering of that duty is to ensure that the telecoms sector contributes towards overall consumer welfare and economic activity.