PIA Information for Ofcom

This is an anonymised summary of responses and comments from 14 respondents.

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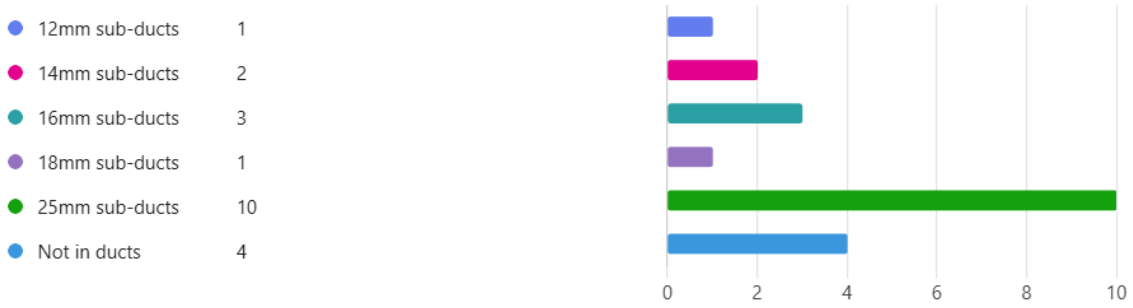
Sub-ducts

Ofcom would like to understand whether PIA users always use 25mm sub-ducts or perhaps smaller diameter sub-ducts or cables not in subducts



Sub-duct usage practices and preferences

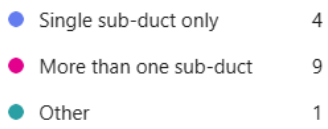
- 25mm Subducts:
  - Generally used as the standard size.
  - Preferred by one respondent for PIA installations.
  - Used for 288f cables and Multiway subduct.
  - Sometimes contains multiple smaller ducts (e.g., 3 x 12mm and 3 x 7mm micro ducts).
- 16mm Subducts:
  - Used when the duct is smaller.
  - Standard for cables up to 144f.
  - About 50% of the spine build uses 16mm subducts.
- 14mm Subducts:
  - Used for blown fibre.
  - Deployed in various network builds (backhaul/urban/rural).
  - Sometimes used with multiple 7mm cables.
- 12mm Subducts:
  - Used in GBVS schemes for spine and distribution routes.
  - Often paired with another 12mm duct as a spare.
- 7mm Subducts:
  - Used in combination with other sizes within a 25mm subduct.

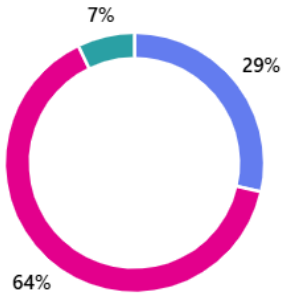
Reasons given for using different sizes of sub-duct

- Efficiency and Space Utilization:
    - Smaller subducts (e.g., 16mm, 14mm) are used when duct space is limited or for specific cable types.
    - Multiple smaller subducts or cables maximize the use of available duct space.
- Adaptation to Network Conditions:
    - Rural builds face challenges due to lack of PIA diversity, leading to varied subduct sizes.
    - Transition to using available space with various subduct sizes to address congestion and optimize costs.
- Compliance and Practicality:
    - Multiple subducts used to meet space requirements and comply with Openreach mandates, despite recording challenges.
    - Stopped using subducts in new works to reduce material costs and address duct congestion

Using multiple sub-ducts

Ofcom would also like to know if you ever use more than a single subduct in PIA ducts – for example, multiple 25mm sub-ducts, because a 25mm sub-duct is not large enough for the number of fibres you are running through the duct? If so, what is the largest number of 25mm sub-ducts you have put into a single duct and how often do you use multiple dub-ducts.





Reasons given for using multiple sub-ducts

- Special Projects and Health & Safety:
    - For special projects, with Openreach's approval, additional PIA orders are created to accommodate oversized subducts. This approach minimizes health and safety risks when accessing deep-level manholes.
- Routing and Network Architecture:

    - Multiple subducts are used due to the routing and architecture of the access network, not necessarily due to lack of capacity. This is common in single bore ducts influenced by BT's legacy network.
- Core and Distribution Cables:
    - Separate subducts are installed for core and distribution cables within the same PIA route. This can result in up to three subducts in a single duct.
- Capacity and Space Requirements:
    - Additional subducts are installed when the 25mm duct space is exceeded. This can involve multiple NOIs (Notices of Intent) for additional capacity.
- Parallel Routes:
    - In some cases, two subducts run parallel but take different routes. This is less common and typically involves no more than two subducts.
- Client-Led Projects:
    - On limited, client-led projects, up to three 25mm subducts may be installed. This is rare and usually involves specific requirements.

Duration of PIA access

Some PIA users say they have experienced problems responding to opportunities for long-term customer contracts because they can only demonstrate a minimum of 5 years use of PIA access. Have you experienced this?

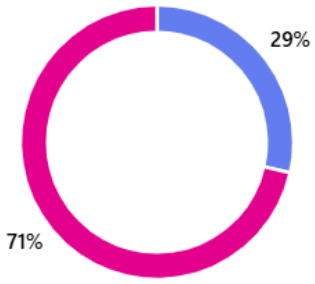
Likewise, INCA has heard reports that investors are concerned at the short contract period for PIA access. Have you experienced this?

Observations concerning the duration of PIA access

- Customer Cancellations:
    - Several major customers are cancelling new orders due to the shorter five-year regulatory cycles.
- Difficulties with the five-year regulatory cycles for spine cable builds
    - proposed a 20-year upfront payment to improve cash flow, profit margins, and asset value. Discussions with OR are ongoing.
- Investor Concerns
    - Investors are not currently worried because PIA access is regulated by Ofcom, but they would be concerned if this regulation changed.
- Concerns about price rises after initial 5-year term
    - After the five-year minimum contract period, billing reverts to yearly, raising concerns about potential sharp increases in rental charges and budgeting for Opex.
- Commercial viability of network builds
    - With assets expected to last 25 years, could be significantly affected by short-term PIA contracts.
    - Some companies use PIA for long-term deals and public sector contracts, balancing risk and reward, but prefer longer PIA terms due to investor concerns about shorter contract terms.
    - Business customers and BDUK builds require longer-term commitments, leading to discussions about the longevity of the PIA remedy and potential changes in BT's SMP status.
- Limited Experience:
    - Some companies have not experienced problems yet but note their relatively short period of PIA usage.

Billing

Are the bills easy to read?



Are the bills easy to reconcile with your own data?

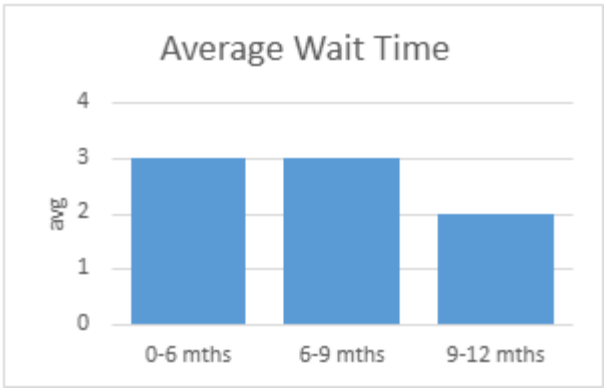
Billing concerns

- Helpful but Inflexible:
    - The service is generally helpful, but there is no flexibility in adjusting payment dates.
- Challenging & Drawn out Billing Processes:
    - Billing disputes are difficult to challenge, with long response times and often unfair outcomes. Some disputes remain unresolved for over a year.
    - The billing challenge process is lengthy and recovering costs or resolving disputes takes considerable time.
    - There is no clear documented process for dealing with certain issues. Commercial contacts are nonresponsive and argumentative, with no SLAs for replies, unlike the prompt payment expectations for bills.
- Unreasonable & Subjective Charges:
    - Disputes over NASO/SPO charges are often pushed back with a rigid approach, and there are gaps in PIA charges. OR is seen as unreasonably levying charges that could have been avoided.
    - Verification charges for activities are seen as subjective, adding to the complexity and dissatisfaction with the process.
- Vague Contract Terms:
    - The PIA contract lacks clarity on handling discrepancies, leading to differing opinions.
- Complicated Dispute Template:
    - The template for raising billing disputes is complicated and submitting it correctly is troublesome. Emailing the disputes department is often the only effective way to submit a claim.
- Lack of Communication:
    - There is poor communication once a dispute is raised, with no specific timescales provided, leading to months-long resolutions.
- Time-Consuming: The overall process is very time-consuming

Tour of Duty

Do you participate in the 'Tour of Duty'?

How long do you typically wait for D-poles to be replaced? (average and maximum wait times would be helpful – again this can be estimates)



Maximum wait time reported: 1064 days

Reasons for not following the 'Tour of Duty' process

- Awaiting Data and Updates:
    - Awaiting Openreach to collate data to understand the trial's benefits for APFN.
- Paused Network Build:
    - One CP paused its network build at the end of 2023, making the 'Tour of Duty' process currently irrelevant.
- Delivery and Build Programme Management:
    - The way delivery and build programmes are managed means the Tour of Duty wouldn't be beneficial due to timescales.
- Administrative Burden and Lack of Flexibility:
    - Too much administrative work and lack of flexibility in stating build locations.
- Lack of Awareness:
    - Some are not aware of what the Tour of Duty is.
- Mixed Results:

- While there has been significant improvement in pole swaps, some cases still take too long, reducing overall effectiveness.