



Annex 2: KCOM new services product development – Statement of Requirements (SoR)

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## KCOM Statement of Requirements (SoR)

Submitted by:	CityFibre Metro Networks Limited
Date:	14/05/2026
Submitted to:	KCOM Limited

### SoR title

1. Request under Condition 1 of Part 3 (SMP Conditions) of Volume 4 of the Hull Area Wholesale Fixed Telecoms Market Review 2021-26 for Access to KCOM's Physical Network Infrastructure to span from CityFibre's poles, via KCOM's poles to overcome line of sight obstacles to reach customer premises.

### Outline of Description & Aim

2. We are writing to formally request access specified elements of KCOM's civil infrastructure in the Hull Area, pursuant to KCOM's obligations to meet reasonable requests for network access pursuant to the Ofcom Hull Area Wholesale Fixed Telecoms Market Review 2021-2026 ("Ofcom Market Review") and in particular Condition 1 of Part 3 of Volume 4 of that review.
3. We believe the unique pole congestion circumstances in Hull makes it more vital than ever that telecommunications companies like ours work together to share infrastructure for the benefit of residents of Hull and the East Riding of Yorkshire.

### Regulatory Context and Remedy Framework

4. CityFibre submits this Statement of Requirements on the basis that KCOM controls non-replicable access infrastructure, namely telegraph poles, which are essential inputs for the provision of fixed access services to end-user premises in parts of KCOM's operating area.
5. Consistent with Ofcom's established SMP framework, CityFibre's request is framed to meet the core regulatory tests applied to access remedies, namely that the requested access is:
  - Objectively justified;
  - Technically feasible;
  - Proportionate;
  - Necessary to promote effective competition; and
  - Consistent with efficient infrastructure investment and use.



6. The access sought is limited in scope, targeted in application, and designed to remedy a specific economic and engineering bottleneck arising from KCOM's control of poles in locations where CityFibre cannot reasonably replicate infrastructure or reach premises directly.

### Objective Justification and Necessity

7. CityFibre is deploying fibre infrastructure using its own telegraph poles wherever feasible. However, in certain locations, direct connection from CityFibre poles to customer premises is not technically viable due to:
  - o line-of-sight constraints,
  - o excessive span length,
  - o safety or clearance limitations,
  - o physical obstructions or topology.
8. In these cases, existing KCOM poles represent the only practicable means of enabling connection to the affected premises.
9. Without the ability to span fibre from CityFibre poles to KCOM poles:
  - o connection of the relevant premises would be commercially or physically impracticable;
  - o consumers would be denied effective competitive choice;
  - o infrastructure duplication (e.g. insertion of additional poles) may be the only alternative, contrary to regulatory objectives.
10. The requested access is therefore necessary to overcome a structural bottleneck and to enable CityFibre to compete effectively in downstream access markets.

### Description of the Access Sought

11. CityFibre requests an access obligation enabling:
  - a) Pole-to-pole aerial fibre spanning, permitting CityFibre to install and maintain fibre cables spanning from CityFibre-owned telegraph poles to designated KCOM-owned telegraph poles.
  - b) Associated attachment and routing rights on KCOM poles solely to permit onward connection from those poles to end-user premises.
  - c) Ancillary rights required to make the access effective, including:
    - o surveys and inspections,
    - o installation and make-ready works,
    - o maintenance, renewal, and repair.



This scope is deliberately confined to what is strictly necessary to provide end user connectivity.

### Technical Feasibility and Engineering Standards

12. CityFibre requires that access be provided where:

- the pole can safely accommodate the additional loading;
- all applicable safety, clearance, and engineering standards can be met.

13. CityFibre will:

- use modern, Ultra Lightweight aerial fibre
- comply with agreed loading limits, attachment heights, and clearance envelopes;
- bear the cost of any additional make-ready works that are objectively required.

14. Any refusal on technical grounds must be:

- based on clearly articulated engineering criteria,
- supported by evidence,
- proportionate to the actual risk identified.

### Proportionality and Least-Intrusive Means

15. The requested access represents the least intrusive means of addressing the identified constraint because it:

- utilises existing infrastructure;
- avoids unnecessary additional poles or civil works;
- minimises visual impact and disruption; and
- reduces environmental and highways impacts.

16. Any requirement to deploy new poles instead of allowing limited pole-to-pole spanning would be:

- more intrusive,
- more costly,
- less efficient, and
- likely inconsistent with proportionality principles.

### Non-Discrimination and Equivalence of Access

17. CityFibre requires that access be provided on a **non-discriminatory basis**, including:

- equivalence of inputs where KCOM uses its own poles for analogous purposes;
- no unjustified technical or procedural distinctions between CityFibre and KCOM's internal operations.



18. Equivalent access includes:

- A right to install to provide connection with a retrospective duty to notify KCOM of the completed installation;
- consistent application of engineering rules;
- no margin-squeezing or hidden restrictions.

### Pricing, Cost Orientation, and Fairness

19. Charges associated with pole-to-pole spanning must be:

- cost-oriented,
- reflective only of efficiently incurred costs attributable to the access,
- transparent and auditable.

20. Charges must not:

- include unrelated common costs,
- internal transfer prices inconsistent with external charging,
- penalties designed to discourage use of access.

21. Pricing should be consistent with FRAND-type principles, ensuring the access remedy is effective in practice as well as in theory.

### Transparency and Process

22. CityFibre requires transparent and predictable processes, including:

- published or agreed engineering standards;
- defined survey and approval timescales;
- clear rejection criteria and appeal/escalation routes.

23. Any refusal or conditional approval must be:

- reasoned,
- evidence-based,
- documented in writing.

### Duration and Security of Access

24. Access rights must be:

- secure for the economic life of the fibre installed;
- not subject to arbitrary termination or withdrawal.

25. Termination should only arise where:

- there is a demonstrable and material safety risk, or
- a serious and unremedied breach of agreed conditions.



## Impact on Competition and Consumers

26. Granting the requested access would:

- enable effective infrastructure-based competition;
- increase consumer choice and service innovation;
- align with regulatory objectives promoting network investment.

27. Refusal would risk:

- protecting legacy monopoly advantages;
- foreclosing entry at the final connection stage;
- undermining the effectiveness of infrastructure competition.

## Conclusion and Next Steps

28. CityFibre considers that the access sought satisfies all relevant SMP-style tests applied by Ofcom and represents a proportionate, necessary, and efficient remedy to address a structural access bottleneck.

29. CityFibre therefore proposes:

- engagement on detailed engineering parameters,
- development of a standard access product or agreement,
- escalation to dispute resolution if proportionate access cannot be agreed.



## 1. User Story

As a Wholesale Access Network Provider, I want to

- Be able to connect to end user premises using existing infrastructure which I have deployed even in circumstances where line of sight or other topographical issues mean it is impossible to do so because the optimum site is already occupied by existing KCOM infrastructure So that
- I can expand choice for end users without deploying any further infrastructure in an already congested urban environment.
- I understand the activities that need to be undertaken and the processes that need to be followed to install, maintain, upgrade, and remove Network Apparatus to/from KCOM's Physical Infrastructure
- KCOM can ensure they and their Physical Infrastructure are able to support my forecasted usage.
- Have access to a library of Engineering Principles for the installation, maintenance, and removal of Network Apparatus to/from KCOM's Physical Network Infrastructure

So that

- I can ensure my Network Apparatus installed on/in KCOM's Physical Network Infrastructure adheres to and is compliant with KCOM's requirements/specifications.
- I understand the processes my Engineers (or Subcontractors) are required to adhere to when working on/in KCOM's Physical Network Infrastructure to enable me to understand the time and cost associated with undertaking work on KCOM's Physical Network Infrastructure

As a Wholesale Access Network Provider, I want to

- Access information on KCOM's Physical Network Infrastructure such as pipes, masts, ducts, inspection chambers, split couplings, manholes, cabinets, buildings or entries to buildings, antenna installations, towers and poles. Such information should include details of KCOM's information on the condition of all poles such as their status and whether they can be climbed, whether equipment can be installed and any restrictions on such use.



- access all KCOM engineering specifications in relation to the physical network infrastructure to allow equivalent engineering rules to be embedded into methods and practices whilst accessing the network such as pole top space envelopes.
- access processes such as duct blockage removals, gifting of assets such as chambers, post work inspections, system based notifications of intent and build completes rather than Excel spreadsheets.
- be able to remove redundant Copper drop wires and replace with Fibre where capacity is a problem
- Understand what, if any audits will take place by KCOM after build complete and the standards of audit which will be employed
- to be able to meet with KCOM on a regular basis to discuss operational issues, opportunities, risks, requests for product improvements etc
- Have access to any ongoing KCOM projects such as maintenance schemes or pole renewal programmes
- Be able to access the location, route, type and current use of KCOM's Physical Network Infrastructure
- Have programmatic access to retrieve information in an accessible geodata format such as SHP or GeoJSON files

So that

- I can determine the quantities of KCOM's Physical Network Infrastructure I need to use when planning a Network Deployment to allow me to determine the cost of a prospective Network Deployment



## 2. Required by date

*As soon as possible.*

## 3. Requirement Category

The requirement category for this statement or requirements is Product Feature / Service Enhancement

## 4. Priority to Your Business

We have assessed this statement of requirements as having the following priority.

- C1 – Critical Business Imperative

Area	Company name / Lead CP	Contact Details
Submitting CP – standalone submission	CityFibre Metro Networks Limited	Domhnall.dods@cityfibre.com
Submitting to JDWG (Title)	KCOM Limited	Lawrence Wardle <a href="mailto:lawrence.wardle@kcom.com">lawrence.wardle@kcom.com</a>



Agreed Lead CP		
Supporting CP – 1		
Supporting CP – 2		
Supporting CP – 3		
Supporting CP – 4		
Date / Issue ref	Comments	Updated By
Date / Issue number	<i>Any key comments of changes</i>	<i>[Product Lead (or other assigned project manager)]</i>