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 improvements to KCOM's existing Physical Network Infrastructure product to make the product simpler and quicker to use to deploy infrastructure in the Hull Area.

Outline of Description & Aim

2. We are writing to formally request improvements to the existing Product under which KCOM provides access to 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").
3. The Ofcom Market Review found KCOM to have Significant Market Power (SMP) and imposed obligations on KCOM to address Ofcom's competition concerns and ensure that consumers of retail and wholesale broadband service in Hull get better services and competitive prices.
4. In 2024 Connexin requested access on fair and reasonable terms to KCOM's existing physical infrastructure under the Ofcom Market Review ("SMP Regulatory Framework").
5. KCOM published a voluntary PIA product in response to this SOR following negotiations with Connexin and other Communications Providers but this offer was not made on "the same terms, processes and methods used in Openreach's national Passive Infrastructure Access product" as had been requested in the Connexin SOR.
6. The PIA Product offered by KCOM has a number of features which make it less practical, more time consuming and less easy to consume than the equivalent PIA product offered in the rest of the UK by Openreach.

7. We believe that further simplification of the product and supporting processes and procedures would greatly improve the rate of adoption of the PIA product and that this would reduce the need for duplicate infrastructure by facilitating greater sharing of infrastructure and ensure that as many of the residents of Hull and the East Riding of Yorkshire enjoy the same benefits of competition as consumers in the rest of the UK have enjoyed for some years.
8. 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.

Objective Justification and Necessity

9. CityFibre is deploying fibre infrastructure using its own telegraph poles wherever feasible. However, in order to avoid further duplication of infrastructure, and in particular poles, CityFibre would like to use the existing KCOM duct and pole network rather than continuing to duplicate the existing KCOM ducts and poles.
10. KCOM's current voluntary PIA offer falls materially short of what would be considered an effective and usable access product. Compared with Openreach's PIA arrangements, it is demonstrably more complex and bureaucratic, with no clear justification for the additional procedural burden imposed on access seekers.
11. As a result, the offer does not provide a credible basis for facilitating competition or supporting efficient infrastructure build. We therefore request that KCOM further refine and simplify its PIA product, processes and procedures so that in so far as reasonably possible they are aligned, in both substance and practical operation, with the prevailing PIA standards applied by Openreach across the rest of the UK.
12. Without the ability to use the KCOM infrastructure in the same manner as Openreach PIA operates (i.e. forecast, survey, order, and then document via build complete records), the KCOM PIA product will remain too time consuming, complex, bureaucratic and expensive to use.
13. Failure to align the KCOM PIA product more closely with the model used throughout the rest of the UK means that some consumers in the Hull area will be denied effective competitive choice.
14. The requested changes are therefore necessary to overcome a structural bottleneck and to enable CityFibre to compete effectively in downstream access markets.

15. The requested changes are made under Condition 1 of Part 3 (SMP Conditions) of volume 4 of the Hull Area Wholesale Fixed Telecoms Market Review 2021-26.

Description of the Changes Sought

A. Network Adjustments – Operational Practice

- Move to a "fix first, notify after" NA model
    - Allow CPs to carry out Network Adjustments as encountered during build, with post-event notification and evidence.
    - Remove routine pre-approval as a gating step.
- Enable KCOM-delivered NAs in practice
    - Create an operational pathway for requesting KCOM to carry out complex or specialist NAs (e.g. asbestos, structural pole work).
    - Define agreed handoff processes rather than leaving CPs unable to proceed.
- Clarify operational treatment of overhead NAs
    - Clearly define which pole-related works:
        - CPs can carry out themselves
        - Must be undertaken by KCOM
- Introduce clear operational timelines
    - Set standard timescales for:
        - Complex NA request consideration
        - Completion of KCOM-undertaken pole works and circumstances which would justify KCOM changing the date on which the work is due to be completed
        - Payment of NA when evidence submitted by the CP
        - Avoid open-ended or discretionary holding periods that stall build programmes.

Outcome - Eliminates build stop-start behaviour and mirrors Openreach's field-led NA approach.

B. Surveys, Planning and Build Execution

- Decouple surveys from full build plans
    - Permit duct surveys and blockage testing without requiring finalised end-to-end build designs.
    - Allow survey-led decision-making, consistent with Openreach PIA practice.

- Remove duplicative planning checks
    - End routine re-planning and double-checking of CP designs by KCOM planners.
    - Rely instead on:
        - Defined engineering rules
        - Post-build audit and assurance
- Introduce CP-controlled build progression
    - Align with the Openreach Build Complete process and if not system generated then provide timescales within which build complete must be submitted and acknowledged
    - Align with Openreach's notification-based "build complete" process.
- Allow autonomous emergency and restoration works
    - Enable CPs to carry out emergency repairs without prior approval.
- Implement a whereabouts process aligned with the process introduced by Openreach to ensure accountability by those working in the network, with timescales for KCOM responding to requests from CPs for whereabouts information when investigating damage cases.

Outcome - Enables survey-led decision-making and uninterrupted build progression.

C. Ordering and Workflow Processes

- Simplify ordering inputs
    - Reduce the level of detail required at order stage (e.g. exhaustive kit inventories and precise placement).
    - Allow high-level intent at order, with detailed configuration provided at build complete.
- Replace email-only workflows where possible
    - Introduce basic structured processes for:
        - Submitting orders
        - Tracking NA requests
        - Issuing build complete notifications
    - Even light systemisation would materially improve usability versus wholly manual handling.
- Standardise operational handoffs
    - Define clear, repeatable steps for:
        - Order placement
        - Build complete

Outcome - Enables efficient consumption of the product and standardises processes and procedures aligned in so far as possible with existing methods of working (ie those used with Openreach).

D. Information and Data Handling (Operational)

- Reduce forecasting as an operational dependency
  - Remove the need to provide detailed rolling forecasts as a prerequisite to placing orders.
  - Treat forward-looking information as indicative operational context, not a gatekeeper.
- Limit operational data sharing
  - Avoid operational requirements to supply:
    - Full staff lists
    - Emergency rosters
  - Rely instead on accreditation and compliance checks, as under Openreach PIA.
- Improve handling of sensitive build information
  - Operationally segregate CP planning and deployment data from KCOM's downstream network build teams.
  - Ensure access is limited to staff with a clear operational need.

Outcome - Reduces friction and competitive sensitivity while preserving operational oversight.

E. Operational Philosophy and Risk Control

- Shift from permission-based to rules-based operation
  - Move away from requiring explicit approval at multiple stages.
  - Define clear rules and standards, with compliance checked retrospectively.
- Reduce discretionary intervention
  - Eliminate operational triggers that allow KCOM to pause, veto or unwind deployment late in the process.
  - Align with Openreach's approach of enabling build unless a defined rule is breached.
- Focus assurance on outcomes, not process
  - Prioritise safety, integrity of infrastructure and service outcomes over procedural compliance.

Outcome

Aligns KPIA's day-to-day operation with Openreach PIA's facilitative model.

Summary (Operational Lens)

To resemble Openreach PIA operationally, KPIA would need to:

- Enable **faster, CP-led deployment**
- Reduce **pre-approval, re-planning and discretionary controls**
- Allow **surveys and NAs to drive build decisions**
- Rely on **post-build assurance rather than pre-build permission**
- Simplify and systemise **day-to-day operational interactions**

Impact on Competition and Consumers

16. Granting the requested access would:
    - enable effective infrastructure-based competition;
    - increase consumer choice and service innovation;
    - align with regulatory objectives promoting network investment.
17. Refusal would risk:
    - protecting legacy monopoly advantages;
    - foreclosing entry at the final connection stage;
    - undermining the effectiveness of infrastructure competition.

Conclusion and Next Steps

18. 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.

19. 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.

User Story

As a Wholesale Access Network Provider, I want to

- Be able to deploy infrastructure using the KCOM duct and pole network in as smooth and efficient a way as possible in a manner which is, in so far as possible, consistent with the way I use the Openreach network via PIA in the rest of the UK so that I can expand choice for end users without deploying any further passive 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 usage.

As a Wholesale Access Network Provider, I want to

- 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, manholes, split couplings, 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.
- 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

Required by date

As soon as possible.

Requirement Category

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

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 lawrence.wardle@kcom.com

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