



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

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KCOM Statement of Requirements (SoR)

Submitted by:	Connexin Limited
Date:	18/01/2024
Submitted to:	KCOM Limited

1. SoR title

Request for Access to KCOM's Physical Network Infrastructure

2. Outline of Description & Aim

We are writing to formally request access to KCOM's physical infrastructure network pursuant to the Ofcom Hull Area Wholesale Fixed Telecoms Market Review 2021-2026 ("Ofcom Market Review").

We believe this 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. The Ofcom Market Review found KCOM to have Significant Market Power (SMP).

The Ofcom Market Review imposes remedies 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.

We therefore make an application to KCOM under paragraph 2.12 of the Remedies Section (Volume 3 of the Ofcom Market Review), for access on a fair and reasonable basis to KCOM's existing physical infrastructure, in particular ducts ("SMP Regulatory Framework").

More specifically, we therefore request that KCOM offers up access to its network of ducts and poles across Hull and the East Riding under the SMP Regulations based on



the same terms, processes and methods used in Openreach's national Passive Infrastructure Access product. We consider such a request is reasonable under the SMP Regulatory Framework. We believe that KCOM is now effectively required to provide the relevant form of physical infrastructure access on fair and reasonable terms, including fair and reasonable conditions and charges.

We would like to work towards a sharing agreement for the totality of the KCOM network, as is the case for the Openreach network nationally.

3. User Story

As an **end user**, I would like to be able to

- Purchase Internet Access Services (IAS) from Communication Providers who use KCOM's Physical Network Infrastructure to house their Network Apparatus

So that

- I have a choice of both Retail Communication Providers (RCP) and Wholesale Access Networks
- Existing Infrastructure can be reused and it's not necessary for competing RCP or Wholesale Access Network Providers to deploy new Infrastructure to provide a choice of Fixed Line IAS

As a **Wholesale Access Network Provider**, I want to

- Have an uncomplicated and transparent pricing model, akin to Openreach's Physical Infrastructure Access (PIA) product.
- Have a comprehensive product and process description of KCOM's Physical Infrastructure products.
- Have a process to forecasting my predicted usage of KCOM's Physical Infrastructure to KCOM

So that

- I can plan my Network Deployments and easily establish the commercial viability of planned Network Deployments



- 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.

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, cabinets, buildings or entries to buildings, antenna installations, towers and poles.
- 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



- Information on KCOM's Physical Network Infrastructure can be imported into my Geographic Information System (GIS) to allow me to plan and record the location of Network Apparatus I install on/in KCOM's Physical Network Infrastructure within my GIS

As a **Wholesale Access Network Provider**, I want to

- Be able to have my staff, or subcontractors, access KCOM's Physical Network Infrastructure without the need for supervision by KCOM's engineers
- Have access to KCOM's Physical Network Infrastructure to conduct surveys and install, maintain, upgrade and remove my Network Apparatus
- Understand the accreditations required for engineers accessing KCOM's Physical Network Infrastructure
- Use engineers, who are accredited in line with national principles (for example holding Openreach SA001, SA002, S005, S006 for surveys, and SA001, SA002, S007, S008, S009 for network build), to access KCOM's Physical Network Infrastructure without the need to undertake additional accreditation.

So that

- I don't have to incur the cost of KCOM Engineer supervision when accessing KCOM's Physical Network Infrastructure
- I don't have to manage the scheduling of the installation, maintenance, or removal of Network Apparatus around the availability of KCOM's Engineering team
- I understand the requirements for my engineers to be able to access KCOM's Physical Network Infrastructure to allow me to use KCOM's Physical Network Infrastructure product.
- Engineers who are already accredited to national principles can access KCOM's Physical Network Infrastructure without the time or cost implications associated with undertaking additional provider specific accreditation with duplicates those which they already hold.

As a **Wholesale Access Network Provider**, I want to

- Be able to inform KCOM where there is a defect or fault with their Physical Infrastructure



- Repair faults or defects with the KCOM Physical Infrastructure, where appropriate, using my own Engineers or Subcontractors

So that

- Defects or faults with KCOM's Physical Infrastructure are repaired by either KCOM or us in a timely manner.
- The installation of my Network Apparatus is not unnecessary delayed by defects or faults with KCOM's Physical Infrastructure

As a **Wholesale Access Network Provider**, I want to

- Have access to appropriate Health and Safety documentation, including a method statement template, RAMS template, ACM arrangements in the underground network, access network risks, pre-climb/pre-work check, and guidelines for handling gas and contaminated water in the KCOM network.

So that

- I can carry out my obligations under the Health and Safety at Work Act 1974 and/or other applicable legislation

4. Market Context

We believe there is significant unharnessed potential for Wholesale Access Network Providers to utilise KCOM's Physical Network Infrastructure in the Hull Area, with significant sustainability, efficiency, and environmental benefits.

Market Analysis/Research:

- There are currently at least three (Connexin, MS3 and Grain) independent Wholesale Access Network Providers operating in the Hull Area. As a result, much of the Hull Area now has two or more competing Wholesale Access Network Providers. Two of these (Connexin and MS3) have publicly expressed interest in using the KCOM network as an alternative to building their own new Physical Network Infrastructure.
- In December 2021 there were over 130 providers registered with Openreach to use PIA; and in September 2023 Telecoms.com reported that there were over 100



Altnets operating across the UK. This clearly shows that there is UK wide demand for Physical Network Infrastructure products.

Positive Impact on Residents:

- Addressing residents' complaints to MPs about the duplication of telecoms infrastructure.
- Our proposition aims to enhance the Streetscene by avoiding unnecessary clutter and preserving the aesthetic appeal of the urban environment.

Environmental Responsibility:

- Commitment to sustainability by minimizing the carbon footprint through infrastructure reuse.
- Contributing to local and global environmental goals by adopting eco-friendly practices.

Community Engagement:

- Establishing open communication channels with residents and community leaders to address concerns and showcase the positive impact of infrastructure reuse.

Conclusion: Our market proposition is not just about connectivity; it's about responsible growth and environmental stewardship. By KCOM's making available it's existing Physical Network Infrastructure, it will align with the desires of Wholesale Access Network Providers, reduce environmental impact, and address residents' concerns. Together, we can build a connected and sustainable future for the Hull Area.

5. Required by date

As soon as possible.

6. Target Price & Volumes

We envisage, that the pricing for KCOM Physical Network Infrastructure will be similar to BT Openreach's PIA Pricing which are available on the Openreach website



- Duct Products -
<https://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=z75T9D0yfFKL0UorCMMA7OVMbA8c5ofXzFv23yZvBj9Z6rNZujnCs99NbIKJZPD9hXYmiiixH6wrCQm97GZMyQ%3D%3D>
- Pole Products -
<https://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=HVq9a8GLQXHxxeddQQNTOU54K0Q0jcp%2BntrdT9k8TPIZ6rNZujnCs99NbIKJZPD9hXYmiiixH6wrCQm97GZMyQ%3D%3D>
- Ancillary Rentals -
<https://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=5U%2BT4J34ZzADdeE3wLse8prmJTmzH7GBw64NLcFpYmDz6rNZujnCs99NbIKJZPD9hXYmiiixH6wrCQm97GZMyQ%3D%3D>
- New Build, Enabling Works, Ancillary Items and Network Adjustments -
<https://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=%2BxxzCdLXIVS2hHTfdTw%2FyFpqGjRTzjXv9ULYgsx2PF89q%2FCUHfmZJHKkF036xG69e6YShZ82RgLOGLsH2e9%2Bmw%3D%3D>
- Licences : Early Termination Charges -
<https://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=5g9dpnQe6vF8IPq33D0F3BNfDYwVzrSllr31qvn7%2By9Z6rNZujnCs99NbIKJZPD9hXYmiiixH6wrCQm97GZMyQ%3D%3D>

Connexin have provided forecasted usage for key products as Commercially Confidential Information (CCI) separately to this request

7. Requirement Category

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

8. Priority to Your Business

Connexin's have accessed this statement or requirements as having the following priority.

- C1 – Critical Business Imperative

Area	Company name / Lead CP	Contact Details
Submitting CP – standalone submission	Connexin Limited	Furqan Alamgir ceo@connexin.co.uk
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	<i>Any key comments of changes</i>	<i>[Product Lead (or other assigned project manager)]</i>