Mark: Good morning and welcome to BT. So you kindly sent some questions across beforehand so what we've done is we've prepared a little presentation, and hopefully we will cover those questions in the presentation as well, but please feel free to interrupt and ask questions as we go. We'll try to make this quite interactive. Let me begin just by introducing myself and my colleagues; I'm Mark Shamaron, the group director of regulatory sales for BT, and that means I'm responsible for BT's regulatory strategy and engagements. So both the development and the implementation of this have a lot to do with the regulator of Ofcom in the UK, but I'm also responsible for regulation around the world as well so I have a lot of interaction with other regulators and other markets as well. It's quite an interesting and challenging role. Mike, I'll let you introduce yourself.

Mike: I'm on Mark's team. I've been on regulatory for the last few years. I work on active projects in the regulatory framework and the regulatory obligations that we have. So for example the market review process that Ofcom has so I'm project managing for the market review at the moment. I've worked on other projects such as the BT undertakings.

Taiwanese man: On behalf of the (?) and our small delegation, I would like to express my sincerest gratitude to all. We are excited to be here and are looking forward to today's dialogue.

Mike: Thank you. And I should just say, I was formerly with Openreach; however I'm now with BT group, I was formerly regulatory director of Openreach as well, so I can bring you experience of both the Openreach side and from BT group as well.

Mark: So, let me take you through, and as I say, what I'll try to do along the way is answer your questions. Looking at your questions, I've grouped them into these four areas. So firstly you have an interest in understanding the broadband market in the UK and how competitive it is and the shape of regulation. Secondly you have some questions about regulation of the market more generally and functional separation and Openreach and the experience of Openreach so we'll talk a little bit about that. A number of your questions touch on the regulation of fiber networks so we've got a few slides on both Ofcom's approach to regulating that market and also what BT and Openreach have been doing in terms of rolling out fiber. We'll also talk a little bit about competition and the work some of our competitors have been doing. And finally you had a question about broadband speeds and how Openreach deal with queries from consumers about broadband speeds so we can also talk a little bit about that as well.

Right. So your first question is that the broadband network is accessed through numerous platforms; so the telecommunications network, the cable TV network, wireless broadband, power lines, and so on. You asked, do we consider the broadband access market to be in full competition or not? And also how does Ofcom evaluate the cost/benefit of BT after it adopted functional separation in principle?

I'm grateful for your opening comments as well. I think if you look at what's happened in the UK communications market, we think that we have a very competitive market that

delivers consumers choice, low prices, innovation, and that also then delivers a real benefit to the UK economy in terms of competitiveness and in terms of GDP growth. We would argue, and I think Ofcom would also argue, that quite a key part of that is this underpinning by BT to provide fairly priced wholesale access products. Quite a key tenant of the development of Openreach was to treat all its customers equivalently. We'll come back to talk a bit later about how the establishment of Openreach has actually allowed Ofcom to deregulate retail markets. And really that's been underpinned by the transparency that the creation of Openreach and functional separation delivers.

The next few slides that we have really talk about this third bullet point. I think if you look at the UK now, it's really one of the more leading countries in terms of the cost and availability of communications services. We'll see here in a minute about today's broadband networks, but it's also important as we move toward fiber that we continue to deliver those benefits as well. So the next couple of slides just give you a few statistics to show the evolution of the market.

So this first slide is to compare what's happened to telecommunications prices in the UK to prices in other utility sectors; so gas, water, and electricity. What you can see here, as you go back to 1990, telecom prices have been going down, whereas if you look at the energy sector, prices have been going up. For me, a lot of that is the fact that the market is competitive. So you asked the question at the beginning; do you think there's full competition? I think this is good evidence that there is, because of course competition drives low prices, new innovation, and so on. It's interesting, I guess, in a way, to compare because each of these sectors are regulated. And to say, well, telecommunication prices have gone down, and utility prices have gone up.

Taiwanese man: So the situation of the market, the energy, the competition of these markets are not.

Mark: Less effective.

Taiwanese man: I think another reason is the development of new technology, making the cost go down all the time. And the energy prices, that's something regarding supply and demand. The resources are always scarce.

Mark: I think that's right, although obviously there is innovation in the energy markets as well, with solar power and wind power and so on. So I think that you can't draw that conclusion too far in terms of comparison. But it is quite interesting. These are slides that were actually prepared to share with the shadow chancellor in the UK in the Labour party, because at the moment, there's a lot of focus -- the UK is in a recession -- there's a lot of focus on impact on users. And I think it's interesting to say that, actually, in telecommunications, UK government you don't need to worry because prices have been going the right way. Whereas if you look at the energy sector, there's more cause for concern, because real prices have been going up. But I take your point about scarce commodities. But I think the structure of these other markets is quite different, and their approach to regulation is quite different to the telecoms market.

If we turn now to look then at broadband... there's a lot of information on this site but I think it's quite helpful. Let me just explain what there is. So this top line is telling you about the total number of broadband subscribers in the UK. So you can see that at the moment it's standing at just over 21 million broadband subscribers. The below, you've got two blocks. The first block tells you about the platform competition, wholesale competition, between the different platforms. And so what you have here is the first line is broadband provided over BT wholesale network. So this is, I guess you'd call it bitstream. Bitstream broadband, IP broadband. This line is the cable TV network. So this is Virgin Media; doxus is just the transmission technology that they use. This line is unbundled local loops, local loop unbundling. And the final line, then, is other networks. So Kingston, for example, is an operator that operates just up in the north of England. You've also got fixed wireless access, and you've also got satellite. So this gives you a sense of how the competition divides our platform. This bottom section here is more to do with competition at the retail level. We're looking at the retail providers so you've got BT retail, which is the division of BT that deals with residential packages. You've then got Virgin Media who is the cable TV operator, TTG is your big, primarily residential provider of telecom services in the UK. So they provide services over the BT network; they buy wholesale inputs from BT and then sell services to our users. Skybeam, they are the satellite television operator, but they also have a quite large and growing broadband and communications division. And again, they buy unbundled local loops from BT to provide telecom services to their customers. Orange is a mobile network operator. They buy bitstream services from BT wholesale. O2 are another mobile, so they're owned by Telecompter, the Spanish company. So again you can see here, there's quite a lot of competition at the retail level and at the platform level as well. BT retail has about 28 percent of retail subscribers. BT has got about 6 million out of 21 million which is about 28 percent. There's a slide about this in a minute, but that's quite a low share for an incumbent operator. This slide shows we've looked across Europe, in fact. You can see here that BT has the lowest shares for an incumbent operator compared to these other markets.

Taiwanese man: In Taiwan, it's 97%.

Mark: So clearly it's a good indicator of competition or lack of competition. (go back a couple slides) So this one talks about broadband penetration in the UK. So we said 21 million customers, that's over 70% of households in the UK take in broadband services. That's more than the USA, more than Germany, more than Italy. The speed of uptake has been quite remarkable as well because if you went back, say, 10 years, it would only be about 10%. It's been really rapid growth, we'll probably come back to talk about this as well because I think the creation of Openreach has been quite an important driver of broadband takeup, and especially the development of unbundled local loops.

This slide shows you broadband prices, which of course is another measure of competition. This is data taken from the OUCD that shows that the UK has very competitive broadband prices. These are retail prices.

Taiwanese man: You mentioned that the low price, one of the reasons is the establishment of Openreach.

Mark: Yeah, and the strong competition both at the wholesale level and at the retail level. It's those factors together, really, that have driven down broadband prices. The market at the retail level is really very competitive. There are 3 or 4 really big players; so there's BT retail, then the two players that I mentioned who buy wholesale services from BT, so you've got the TTG and you've got Sky. And then you've got Virgin Media the cable TV operator. So you've got 4 very strong fixed broadband service providers. And then of course you've got mobile and the growth of generation LT technology as well. That drives a lot of price competition at the retail level. There's quite aggressive pricing and advertising to encourage customers to switch between the networks. What we're seeing a lot of is bundling a lot of services together, so increasingly it's cheaper to take your telecom service and your broadband service and your TV service from the same supplier. And often it's cheaper to take all three together than it is to take them individually. And so you've got some very strong players in there. Sky television, for example, are very strong in the pay TV market. As a result, they have a very compelling brand in the market place and very keen pricing. There's a lot of focus now on competition to get access to television content. Sky, for a long time, have had a monopoly of access to sports in particular, primarily football is an important draw there. But also to films as well, so they've got relationships with each of the 6 major Hollywood studios and they have all the first movie release rights. Our view as BT would be, telecoms is very competitive and you've seen the evidence, and there is less competition in the pay television market. We think that the approach that's been taken to successfully regulate telecoms should also be applied to the pay television market as well. Because, going forward, if people are taking this bundle services of telecom, broadband, and television, you need access to that content in order to compete.

Taiwanese man: (asks a question, can't understand him)

Mark: It works best, I think, on the BT network. It's very easy if you take a service from, let's say Sky, and buy unbundled local loops from BT; it's very easy to move your service from Sky to say, Talk Talk, who use the BT platform, or to BT itself. It's a little bit harder to move from the BT platform to the cable TV platform. Although there is regulation.

Mike: There's an agreed process for the industry.

Mark: But the regulator is very keen to encourage switching, and to reduce the barriers to switching. So in fact there's a consultation at the moment about consumer switching to ensure the barriers are as low as possible. Because again that's an indicator of the competition. There's a lot of focus by Ofcom on things like number probability. But also the process to check and validate the migration, because there's been some experience in the UK of people, what is known as "slamming", which is they will move you across to another provider even if you didn't want to go. So there's been some experience of this, which the regulator's been focused on.

Mike: The final slide in this section is really just to say, we believe the broadband market in the UK is fully open to competition and is competitive. This slide tells you about regulation of the market. It's probably best to start from the bottom and read upwards. Where we are today in retail markets, there is no economic regulation of broadband. There is no retail price controls. Ofcom has said there is sufficient competition at the wholesale level such that we don't need to regulate broadband retail prices. At the wholesale level, regulation divides into two. So you've got regulation of the wholesale broadband access market, so this is regulation of bitstream services, IP stream services. Here, what Ofcom have done is to divide the market into three different areas.

Mark: Market 3, which is about 75, 76% of the UK, and that's the urban areas, urban/suburban, where there's lots of infrastructure competition, so where there's BT there will be at least two other companies. It could be local loop unbundlers or Virgin.

Mike: And Ofcom has said Market 3 is competitive. We don't need to regulate Market 3 because of the competition.

Mark: The Intermediate market, Market 2, so that's sort of the outlying suburban areas, in those areas there's just BT and another provider, so that might be Virgin or it might be an unbundler. And that's about 10% of the UK. Market 1 is the most rural part of the country. Here, BT is the only provider at the wholesale level. That's about 12% of the country by population. So the vast majority of the country is deregulated at this level.

Mike: Yeah, so really what you have is no regulation at the retail level, you have regulation at the IP stream level, but only in 22% of the country so the rest is deregulated. And then you have regulation further upstream at what is known as wholesale local access. What this does is it gives BT the obligation to provide unbundled local loops. Also fiber products; we'll come back and talk about this, but we have an obligation to provide a wholesale fiber service. We also, since October 2010, have had obligation to open up our duct network and our pole infrastructure for other players. So there's duct and pole sharing as well. Poles are the wires, and ducts are the underground tubes.

Taiwanese man: And what is sub-loop?

Mike: Sub-loop is when you unbundle the service from the customer premise, so the street cabinet. So a fully unbundled local loop would take you from the telegram exchange all the way to the customer. Sub-loop only gives you that last bit, so the first concentrated unit on the cabinet.

Mark: Local loop connects the customer to the exchange, sub-loop connects the customer to the cabinet.

Mike: My drawing isn't very good. So you have the customer premise, and you have a concentrated unit here with cabinets. And then you go back to, this is the BT local

exchange. Local loop unbundling, so LLU, gives you the connection all the way to the end user. And sub-loop unbundling is only this part, to the cabinet. From the cabinet to the user.

(looking at slide)
This is bitstream up at the top which is whole internet service, and then we've got GA which is fiber, and then the cabinet industry which is just that bit. And then LLU is all the way to the exchange.

In this market, in the parts of the country where we don't have LLP, we've got no obligation to supply to these sort of providers, but we do because that's BT wholesale's business model. So even though it's not an obligation, it's in our business to do that, so that's quite an important point.

Mark: BT believes in wholesaling services. Of course we have regulatory obligations in many markets, but even when we don't we often still have wholesale services because we think that throws the overall market.

Mike: So you have two questions; the first is about has each country developed their communications market and competition? There are differences. So you mentioned, for example, that it's a 97% share that the incumbent has in the broadband market in Taiwan compared to 28% here. So you asked, if regulators wish to follow functional separation, how could they look after the items or requirements? And this is something we've talked quite a lot about to the regulators, isn't it Mark? Because I think you do need to adjust your regulations to reflect the market circumstance. And let me come back to that in a moment because, I think what I'll say is, you couldn't just take the UK model and put it in Taiwan and expect the same results. You'd have to adjust it given the state of competition, the strength of the different players, even down to the structure of the network.

And then the second question that you asked was, in terms of the costs of functional separation, should BT and its shareholders ultimately bear that cost?

This first slide really does two things. It firstly talks about the BT structure but also it's quite useful to explain how the regulators went about deciding where to regulate. And I think to do functional separation in Taiwan, these are the kind of things you'd need to think about. What we have is Openreach. And Openreach supplies services both to other parts of BT, but also to a whole range of wholesale customers. And what the regulator is doing -- so Openreach is essentially known as the local access network to BT -- and when BT and Ofcom were thinking about the creation of Openreach and functional separation, one important question is where do you draw that boundary? Because you know, Openreach could also have included BT wholesale, it could also have included parts of the retail market as well. So the sorts of questions you would have to ask, and the questions that Ofcom asked are, where do we think competition could be sustainable? So the idea behind Openreach is to draw this boundary around what you think are the enduring bottlenecks, and Ofcom and ourselves took the view

that actually, the local access network was an endurable. It was very unlikely that you were going to get someone else to build a competing access network. So what they decided was the base for competition was local loop unbundling. And that was how they got competition for the local access network. They got Openreach to primarily sell unbundled local loops. That was Ofcom's model of competition when they went to functional separation. So I think the first question to ask yourselves in Taiwan is, how deep into the volume chain do you think people could compete? Now of course this was done at the time that it was mainly steel and copper networks, we now have fiber networks as well. So your first question is -- well, let's think about fiber for a moment. Where do you draw that line with fiber? It could be, say, we're going to draw that line with duct and pole sharing. So all we're going to require the incumbent to do is allow third party access to their ducts, and that will be sufficient. Or you may say that's not sufficient, you will also require them to provide a wholesale fiber service, and then you draw the boundary there. Or it might be about dark fiber, or maybe you'll say no it must be lit fiber, and you draw the boundary there. And I think the answer to that really depends on your views about competition and how competition will develop. Do you think that people who enter the market in Taiwan at the dark fiber level? At the duct and pole sharing level? Or do you think that it should be based perhaps on fiber access? So these are the kind of questions that Ofcom thought about when deciding this is the right boundary around Openreach.

Taiwanese man: So in the UK, the boundary was the line drawn.

Mike: Yeah, and initially it was mainly around unbundled local loops.

Mark: Once you've done that, so you've decided what is your bottleneck part of the network. What you then have to do is say, how do you then enforce that boundary? These are set out in some of the takings that BT gave to Ofcom. There are some key elements to this. The main one is this concept of equivalent of input. The idea is, when I sell an unbundled local loop -- imagine I'm Openreach for a moment. I'm selling unbundled local loops. The unbundled local loop that I sell to Mike, who is my colleague in downstream BT will be the same unbundled local loop that I sell to you, my wholesale customer. The same specification, same price, you would order it over the same system and processes as Mike would order it. Because between me and my colleague downstream and you, there is a wall of boundary between us. There are also then other laws. Transparency, information sharing, and duty of confidentiality. So imagine in Openreach, I'm intending to reduce the price of unbundled local loops. I cannot tell Mike before I tell you; I have to tell you both at the same time.

Mike: Also, there are various requirements around, for example, accounting separation. So you will see in BT's annual reports that Openreach's files are separately reported. This is quite important to give people transparency.

So your next question after you decided where am I going to draw the boundary and functionally separate my operator, you then say how do I police that boundary? How do I put rule in place to make sure my functionally separate part deals with its own division

exactly the same way that it deals with its customer? And there's over 200 provisions and undertakings. So the "rule book" if you like, is really quite detailed.

Mark: And because of that, we have an internal code of practice. Everyone in BT has to do online training in this code of practice and it's monitored so we know who has done the training and who still needs to do it.

Mike: There are some things of course which are transitional. So when you first functionally separate, there's a lot of stuff to do to establish your company as a separate entity, to develop the systems and processes and so on. So there's a lot of work initially. What Ofcom did was set a timetable, so you had to complete this by this time, to track progress, because you can't go fro being a integrated company on day one to a completely functionally separated company on day two.

The other thing we forgot to mention, in the background we talked about the importance of unbundled local loops. So you can see in the background here we've got a timeline. The undertakings were signed by BT and Ofcom back in September of 2005, and you can see at this stage there were almost no unbundled local loops. Over the period, the number has increased up to -- in fact there are more than this now -- this number is up to September 2011 so it's up to about 8 million. It's an enormous change in the market structure and the nature of the competition in the broadband market.

The growth in unbundled local loops is one benefit. I think the next slide talks through some more. The more effective wholesale regulation was gradual transparency in confidence in consumers. What that's done -- and we talked about this a minute ago in relation to broadband -- it's given Ofcom the confidence to deregulate retail markets. Because you've got effective wholesale competition, what Ofcom has done since 2005 is remove pretty much all the retail market regulations. There's a few.

Mark: All the consumer markets have been deregulated. There's just a bit of regulation left on some business lines and legacies. But that's in the business area, not consumer.

Taiwanese man: So in the UK there's no regulation on retail price services.

Mark: There are one or two very small exceptions. So there are a few retail lease lines that are still price regulated, but there's no regulation in the consumer market at all. It's a very small part of the market that's still regulated. And really this is very low boundary analogue circuits. So Ofcom's idea here is, you've got customers who are effectively locked in to buying analogue services because they can't migrate to the new technology and we need to protect those customers. But the rest of retail market has been deregulated. The main reason they've done this is the creation of Openreach and the contribution that makes to effective wholesale competition. So if you looked at the Ofcom market review documents where they go through this analysis, they will typically cite the creation of Openreach as an important part of their decision to deregulate downstream markets.

There are still regulations of retail services but it's the regulations that apply to everyone and all providers. So it's things like consumer protection regulations, customer protection, switching, etc. But no economic price regulation.

So you also asked about the cost of functional separation and who should bear the cost. This is quite a hard question to answer, so I'm not going to answer it. But what I am going to do is, this is the report from the European Gridwork of National Regulators. It's really their expert body that advises on approaches to regulation. So they wrote a report back in February 2011, and what they said was, it's actually quite hard to work out the costs of functional separation. And the reason for this is, part of functionally separated Openreach was to say that Openreach had developed systems and processes that meant that the gateway that you purchased unbundled local loops from would be the exact same gateway that downstream BT used. Now, companies upgrade their infrastructure regularly anyway. So how much of this is due to functional separation, and how much would have happened anyway because we saw that enormous growth of unbundled local loops? So it's quite hard to break the two down.

Mike: The other thing is, you've just got one set of systems for internal BT and everyone else, rather than having two different systems. So you get some efficiencies from the same system serving both.

Mark: So BT does not report the costs of functional separation and distinguish them from the normal costs of running the business.

I think it's very important also to think about, from the BT perspective, the removal of the regulation at the retail level is very important. So we spoke earlier about the increasing use of bundles in the market. Before Openreach, if you go back in the UK's telecom history, BT for a long time wasn't allowed to offer television services and wasn't allowed to bundle its services together. So one of the great benefits to BT in this deregulation is that it allows BT retail to provide bundled television services. You may have seen just recently, BT has acquired the rights to some primary league football. And we think that's really important to allow us to compete against Sky in particular in this market. The reason we're allowed to do this is because we are now deregulated, there now aren't any restrictions at the retail level regarding bundling of services. So we think that's a really important benefit to BT. As well as the benefit to the UK in terms of low prices, new innovation, and competition.

Taiwanese man: So, to be clear, the revenue that BT earned before the separation... it should be larger after?

Mark: It's larger after, yes. I mean it's difficult to get an exact correlation and there are other things that affect this, but BT has grown its UK revenues overall since 2005. The share prices have gone up since 2005.

Your next question. I've grouped your questions #3, #5, and #7 together because they ask about fiber based competition in particular. So let's go on and talk about this. Mike,

this is really the point you were making earlier, wasn't it? About BT believes that having an open network is really important. So the whole commercial philosophy of BT is that wholesale competition is good. We build our network on an open basis. Now we've also got regulation that requires us to do this in many markets as well, but what this slide shows is that the Openreach network, and this could be either the copper network or the fiber network, is open to all these players. In the role of fiber, we think it's really important to have as many service providers selling fiber services to our users, buying from Openreach. When Openreach developed its fiber products, it's done that on a very open basis. We've worked with industries saying what kind of product you want, what kind of features, what kind of specification. We have consultations with industry, we have products out there on the market that anyone can buy. And importantly as well, because of improvements of input that we've talked about, the fiber product that I sell my friend Mike from BT retail is the same product that I sell someone from Taiwan. It's exactly the same. And as a result you've got a large number of players in the retail market that all buy services that are ultimately based on the Openreach network. So if you like, there's a kind of coalescence of BT's commercial objectives and the regulator's objectives, because of course as a regulator you like to have lots of competition.

Mike: Now again, going back to your question of would the UK model work in your market? It depends a little bit of the attitude of your incumbent. If your incumbent believes in and embraces the idea of wholesale competition, you're halfway there. If perhaps they don't then you may need more rules, more policement, to check that they're doing what you want them to do.

This slide we've talked about. This is how you get competition. So we've got, this is unbundled duct and pole sharing, this is sub loop unbundling that we've talked about. This is our wholesale fiber product called GEA which is Generic Ethernet Access. And then we have bitstream services as well. So if you're a service provider and you want to offer fiber services using the BT network, you can access it at 1,2,3,4 different levels. Depending on your business model, depending on how much investment in infrastructure you want to make. We think this is probably the most open and most competitive fiber market in the world. We're not aware of any other market that has access at all these points.

Mark: Also you an choose different options in different parts of the country if you want.

Taiwanese man: According to the different area, different facility.

Mike: Yes, and we see that quite a lot. If we look at copper, for example. You may, in an urban area, choose to unbundle the local loop, whereas in a rural area that may not be effective and you take a bitstream service from BT.

Mark: And in fact Virgin does that as well in areas where Virgin don't have their own network, they buy bitstream services from BT.

Mike: Yeah, so the Virgin cable network covers what, about 50% of the country? But they provide services beyond their network by buying wholesale services from BT.

This slide talks a little bit then about BT's investment in fiber. We have announced plans to spend 2.5 billion pounds rolling out fiber into the network. That plan initially, that would bring fiber to 2/3 of the UK by 2015. We've brought that plan forward by a year now to 2014. We already have passed more than 10 million homes in the UK. We believe we have the fastest and largest commercial rollout of fiber in the world. We haven't found another company that has invested so much money without some kind of government support. If you look at other markets, Australia is a good example. The Australian government is planning to spend how many billions of Australian dollars to roll out fiber using the MBM network. So we will get to 2/3 in the UK only using BT money, no public money at all. We have found so far that customers really like fiber. The extra speed that it delivers has been received very well by our end users. It's also very keenly priced so if you're a retail customer, you can actually switch to fiber at no extra cost. If you're taking the top package from BT retail so this would be broadband plus calls, you can switch to fiber at no extra cost.

Taiwanese man: So I think 2.5 billion pounds is quite a lot of money. How is the return? Why would BT like to spend so much money? What's the incentive?

Mike: The payback, we think, is somewhere in the region of 12, 13 years to payback in this investment program. So it's long term commitment.

Taiwanese man: But you have to share this establishment with other competitors.

Mike: Ah! Go back 2 slides. Because we think wholesale is important, that's not a problem. We're spending most of that 2.5 billion pounds to deploy fiber. If fiber's only selling fiber to Mike, we think the market will be smaller than if we were also selling to you three as well. Because you would have a wonderful idea that Mike hasn't had. And competition between you all would grow the overall market. So this is our philosophy.

Taiwanese man: We need to persuade our incumbent!

Mike: You can persuade or you can tell them, right?

Mark: Go forward a couple slides. The important thing to remember here, is that the UK will get fiber to 2/3 of the country without the government spending money, without the regulators saying to BT "we're not going to regulate you anymore", there's no regulatory holiday. So we think this is good for BT but also we think it's good for the UK. And, you know, in truth, it's a little bit of both. The government and the regulator have been very keen to push competition, very keen to push open networks as well. We have to do this but we also think it's the right thing to do as well. It's a little bit of push and pull. It's much easier if the incumbent operator works with the regulator.