



Internet Telephony Services Providers' Association

ITSPA response to the Competition Market Authority's Issues Statement surrounding the proposed merger of BT Group plc ("BT") and EE Limited ("EE")

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) represents over 80 UK businesses involved with the supply next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Wholesale Mobile Access

Following the initial submission made to the CMA in May concerning the merger of BT and EE, ITSPA has decided to submit a response to the Issues Statement, published by the CMA on 17th July 2015, regarding the issue of Wholesale Mobile Access. ITSPA's membership is supportive of Wholesale Mobile Access and believe that this step would provide a remedy to the increasing market influence of the small number of MNOs in the UK. Additionally, it is essential to recognise that Wholesale Mobile Access would encourage innovation, resulting in improved outcomes for UK consumers. If this remedy was adopted, the UK's mobile market could become as competitive and innovative as it is currently for fixed telephony at a premises.

ITSPA is aware of the submissions that Gamma has made to the CMA regarding possible options of how Wholesale Mobile Access could be deployed in the UK and supports their view that the current round of proposed market consolidation means that it is more important than ever that wholesale competition is protected in a manner which they have outlined.