



BT Compliance Committee Bulletin

Issue 16

February 2022

Introduction

Welcome to Issue 16 of the BT Compliance Committee Bulletin, in which we provide an overview of the items considered at the BT Compliance Committee's (BTCC) January 2022 meeting. This meeting was attended by Adam Crozier who became BT's Chairman in December 2021.

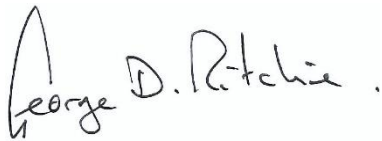
The Committee heard about, and discussed, the following topics:

- The customer-supplier relationships between BT's Enterprise division and Openreach,
- The dynamics of how BT's Digital unit and Openreach work in line with the Commitments, and
- Monitoring reports on the key BT and Openreach processes (Financial Planning, Strategy Development and Commercial Processes).

The BTCC also received an update on remedial actions in previously decided cases.

The BTCC's next meeting will be in mid-April 2022. If you would like to get in touch in the meantime, please contact us via cao@bt.com.

Finally, this will be my final bulletin as BT's Commitments Assurance Director, as I will be retiring from BT at the end of February. We set out in this bulletin the plans for my successor. I wish the very best to all those who have engaged with the BTCC and the CAO over the last four years and those in the industry I met over the preceding years.



George Ritchie
Commitments Assurance Director
11 February 2022

1. BTCC focus areas

1.1. Guest Speaker: BT's Enterprise unit

The guest speaker at the January 2022 meeting was Rob Shuter, CEO of BT's Enterprise unit. He shared his perspectives, as a CP focussed on the business sector, on Enterprise's customer/supplier relationship with Openreach.

1.2. Views from BT's Digital unit

The Committee heard from Harmeen Mehta, BT's Chief Digital & Innovation Officer and CEO of BT's Digital unit. She shared her perspectives on the dynamics of working with Openreach, and an overview of how the Digital organisation works with Openreach in light of parent and supplier functions under the Commitments.

Harmeen's attendance completes the BTCC's review of how recent BT organisational changes have been implemented, in order to ensure that they are in line with the Commitments and continue to adhere to the letter and spirit of the Commitments.

1.3. BT Report

Clive Carter, BT's Regulatory Affairs Director, reported to the BTCC on developments since the November 2021 meeting, including an overview of Ofcom's December 2021 annual monitoring report and BT's proposed scheduling of work to support maintenance of the Commitments and the work of Ofcom's Openreach Monitoring Unit (OMU) during 2022/23.

1.4. CAO People Changes

Louise Rason has been appointed as BT's new Commitments Assurance Director following George Ritchie's retirement from BT after 27 years. An experienced competition lawyer, Louise joined BT in 2014 and was seconded to the CAO in 2021. She will continue to be accountable to and support the BTCC.

1.5. Monitoring and Compliance Report

1.5.1. Financial Planning and Strategy Development Processes

The Committee received the CAO's regular report on its joint monitoring alongside Openreach Commitments Monitoring Office of the key [Strategy Development](#) and [Financial Planning](#) processes. Both processes are running as intended, and while there were some variances to timescales envisaged in the process, these were done for good reasons and in agreement with Openreach. The CAO and CMO continue to monitor the process of developing Openreach's MTP ahead of its submission to and agreement by the Openreach Board prior to being submitted to the BT Chief Executive and BT Chief Financial Officer during February 2022.

1.5.2. FTTP Engagements and Pricing

The Committee received the CAO's report on its monitoring of matters considered under the [Commercial Processes Guidance Note](#). During Q2 2021/22, Openreach's Commercial Policy & Pricing Board approved a total of 26 items. Only one of these was referred for decision to BT. This was final pricing for Project Equinox, Openreach's long-term FTTP pricing, referred as it met the financial thresholds set out in the guidance note.

2. Quick Checks and Breaches Report

2.1. Quick Checks

The BTCC considered one “quick check” undertaken by the CAO.

2.1.1. Quick Check No 14: Networks Incident Reporting

The CAO undertook one compliance Quick Check into a potential concern raised by a Senior Manager in Digital, who queried whether the incident reporting by Networks into Openreach was being done in line with the Commitments. The CAO found Networks was following processes agreed with Openreach, which permit direct contact with Openreach in some situations, and the case flagged was just such an instance. As Networks were acting in line with agreed processes the CAO recommended to the BTCC that there was no need to open a breach investigation. The BTCC agreed with this recommendation.

2.2. Cases notified to the BTCC for consideration

No cases were referred to the BTCC by BT’s Senior Manager, Communications Regulation Compliance for at this meeting.

The Committee did receive an update on outstanding remedial actions in relation to cases decided at a previous meetings.

3. CAO Director’s Parting Thoughts

The BTCC received a paper from the retiring Commitments Assurance Director providing offering his insights and reflections on the progress made since 2016, on the lessons learned since then on how to make the Commitments enduring, and to monitor them effectively, and thoughts on how they could evolve in the years to come to remain relevant.

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