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BT

Northern Ireland
Overview of how Openreach Northern Ireland operates in BT Group

Guidance Note 5

October 2021

Summary

This Guidance Note includes guidance on the practical application of Commitment 18 (Operations in Northern Ireland) and the Governance Protocol, Openreach Northern Ireland.

Openreach Northern Ireland is a virtually separate organisation within its own senior management team. It is hosted by Openreach Limited. In respect of Openreach Northern Ireland.

BT has committed that Openreach Northern Ireland will:

1. Manage BT's Electronic Communications Network in Northern Ireland
2. Provide equivalently in Northern Ireland, the SMP (Significant Market Power) products to the same timescales as Openreach Limited
3. Ensure equal treatment of all CPs
4. Provide transparency around key products and implementation plans for NI Access and Backhaul Networks
5. Have regular and close engagement with NI stakeholders
6. Provide co-location of specified types of equipment at BT exchanges
7. Manage the core network within Northern Ireland

Note: CPs based in Northern Ireland are entitled to be account managed by Openreach Northern Ireland

The role of Openreach Limited in the running of Openreach Northern Ireland

Openreach Northern Ireland retains responsibility for managing its people, setting its own strategy and delivering against this, with Openreach Limited acting as host organisation. All strategic and operational decisions remain with Openreach Northern Ireland, including managing and maintaining the Northern Ireland network together with its associated budgets and investments.

Openreach Northern Ireland has regard to the strategies of the Openreach Division and BT Networks as well as local circumstances, to the benefit of the Northern Ireland community, but decisions rest with Openreach Northern Ireland.

For practical reasons, the Openreach Northern Ireland senior leadership team report into members of the Openreach Limited senior leadership team. However, Openreach Northern Ireland is not part of Openreach Limited. Employees of Openreach Northern Ireland remain employed by BT plc. This distinction must be maintained at all times, both internally and externally.

Information Sharing, Financial Planning and Reporting

Commitments section	18.2a Operations in Northern Ireland

Openreach Limited Sharing Information with Openreach Northern Ireland

- Openreach Northern Ireland is included within the Openreach Limited information sharing confidentiality circle
- This means that there are no restrictions in sharing Openreach Limited information with any individual working in Openreach Northern Ireland. Openreach Northern Ireland employees have an Openreach Organisation Unit code (OUC) and an organisation indicator, Openreach Northern Ireland.

Openreach Northern Ireland Sharing Information with BT Networks (re Core Network)

- The Core network team in Openreach Northern Ireland deal with BT Networks regarding the management and maintenance of the Core Network. The Openreach Northern Ireland team share information with BT Networks on the same basis that Openreach Limited do – via Information Sharing Agreements.

Financial Planning

- Openreach Northern Ireland develops its own AOP and MTP which feeds into the Openreach Service Delivery AOP/MTP.
- Openreach Northern Ireland's financial envelope including Capex, is provided via the host organisation, including any Strategic Investments – except in the case of the core network, which are funded via BT Group.

Financial Reporting

- Reporting exists at an Openreach Northern Ireland level and numbers are included in the host Openreach Service Delivery's reports.
- In regulatory reports, revenue and costs from Northern Ireland products and services flow through to the appropriate regulatory products. In the Regulatory Financial Statements the Northern Ireland numbers relating to Openreach Limited products/services are included in the Openreach Limited numbers.

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Management of the Network

Openreach NI Governance Protocol

- Openreach Northern Ireland has full responsibility for the management and operation of BT's Access and Backhaul Network in Northern Ireland.

Service Levels

- Openreach Northern Ireland is responsible for ensuring that the network in Northern Ireland operates so that all associated SLAs, KPIs and MSLs are consistent with those in Openreach Limited. Any consultations in relation to levels of service to be offered by Openreach will fully include Openreach Northern Ireland to ensure delivery on the same basis in Northern Ireland.

Network and Product Strategies

- Openreach sets the network and product strategies in the UK and Openreach. Openreach Northern Ireland work in partnership to develop network and product plans in relation to BT's Access and Backhaul Networks.
- This ensures the Openreach Northern Ireland network is prepared for Openreach operational and product developments, and these are developed taking account of the needs of all Northern Ireland stakeholders.

Core Network

- Whilst in Great Britain the core network is operated by BT Networks and the access and backhaul networks operated by Openreach Limited. In Northern Ireland both are managed by the same team i.e. Openreach Northern Ireland.
- Strategy for the core network is set by BT Networks in BT Group. UK wide core network deployments require consultation with BT Group for Great Britain and Openreach Northern Ireland MD for Northern Ireland.

Engagement with CPs

Commitments section	18.3: Engagement	18.4: Account Management

Wholesale Account Management of Local CPs

- When specifically requested Openreach Northern Ireland can manage local CPs from a wholesale and Openreach Limited perspective

CP and Stakeholder Forums

- Openreach Northern Ireland regularly engage with stakeholders and produce an annual report on proposed developments to BT's Access Network and BT's Backhaul Network in Northern Ireland
- Openreach Northern Ireland hold regular stakeholder forums (in relation to the strategic direction of BT's Access Network and BT's Backhaul Network in Northern Ireland). These forums give stakeholders the chance to raise any needs, issues and concerns
- Openreach Northern Ireland hold an annual Product Forum to provide easier access to information about Openreach Limited and Wholesale changes
- Northern Ireland CPs can participate in the Openreach Customer Consultation process. They can also use existing forums, the portal for network information and process for co-investments
- Openreach Northern Ireland engages with Northern Ireland CPs to understand their needs and reflect these in Openreach Northern Ireland plans and in discussions with Openreach Limited.

Compliance

Compliance in Openreach Northern Ireland is the responsibility of the Openreach Business Integrity Team with oversight by the OBARCC.

The Openreach Northern Ireland Compliance Plan includes:

- Chairing the Northern Ireland Regulatory Compliance Committee
- Inclusion of Openreach Northern Ireland in the General Condition Plan
- Checking the Openreach Northern Ireland AOP/MTP incorporated in the overall Service Delivery Plan
- Core Network systems access reviews
- Compliance training rates
- Relationship Management (Openreach Limited and Wholesale Account Management) health checks
- Ensure appropriate governance is in place for the equivalent delivery of Physical infrastructure access in Openreach Northern Ireland

Further information can be found on the Openreach Compliance website:
https://intra.bt.com/bt/openreach/independent/commitments/compliance-new/Pages/index.aspx