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DID BROMLEY RESIDENTS REALLY VOTE IN FAVOUR OF ADDITIONAL HOURS?

Flightpath Watch, the group representing residents against the additional operating hours requested in Proposals by Biggin Hill Airport Limited, which are currently being considered by its Landlord, the London Borough of Bromley (LBB), announced today that it has asked the Council for irregularities within the LBB consultation data to be investigated.

The London Borough of Bromley consulted residents across the whole borough on The Proposals from 16th January to 13th March 2015. The consultation enabled residents to respond using an on-line or paper form. Response levels were described by media as *unprecedented* and the results, indicating a majority in-favour, were reported to councillors, prior to the Special Council meeting on 25th March, at which the matter was discussed and an 'in principle' Motion passed.

Using volunteers from the community, Flightpath Watch subsequently completed its own survey, the results of which demonstrated such a significant variation to those from the LBB consultation that FW felt obliged to request the LBB Consultation data under the Freedom of Information Act 2000, to enable analysis. The FOIA request was lodged with LBB on 5th July 2015 and the data provided on 6th October 2015.

Response volumes by network show just two ISP providers, each with comparatively small UK market shares, generated 70% of the total on-line response and 83% of the YES response.

Flightpath Watch Chairman, David Clapham, said; ***"We are most concerned that this exercise appears to have been influenced significantly through a mass input of YES votes."***

The notes below are to assist understanding;

1. For a borough-wide consultation of this nature, each household could reasonably be expected to generate a handful of similar responses, whereas larger business premises may generate higher response volumes but with more varied answers. However, data-analysis has revealed a very different pattern for LBB's Airport Consultation, showing clear evidence that certain sources appeared to be batch-entering high volumes of YES responses, in compressed timeframes. The LBB has confirmed the only means of submitting online responses was for individuals to use the appropriate form on the *Survey Monkey* website, selected by the LBB for the exercise. It has also confirmed it did not employ anyone to collect or enter responses on behalf of residents.

2. Just 15 individual internet addresses provided 7,101 of the total number of online responses. These represent just 0.25% (*one quarter of one percent*) of the 6,071 internet addresses which responded, yet these few generated 25% of the total input. Fourteen of these sources generated 100% YES responses, to The Proposals, whilst the remaining source, a single Eclipse Internet address which generated 5,709 responses, answered YES in 99.84% of cases. The *Eclipse* source generated most of its output during the last 3 weeks of The Consultation, only on weekdays, and almost exclusively between the hours of 9am and 5pm, at rates of up to 700 per day. Although this is just *one* internet address, its contribution made up 19% of all responses and was higher than the *combined* responses from major Internet Service Providers (ISPs), BT, Virgin Media, Sky and Talk Talk.

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3. *Three Mobile* has only a 12% share of the UK mobile operator market, yet *its* network provided 98% of all *mobile* responses, of which 99.64% were YES. These were entered mainly between 10am and 7pm, during the week, with significant drop-off at weekends, and represent 51% of the total fixed-line and mobile consultation responses, with input rates peaking at around 650 on weekdays.

By contrast, major Internet Service Providers (ISPs) BT, Virgin, Sky and Talk Talk contributed consistent response volumes on all days of the week and over much broader times of the day. Notably, these and similar sources provided not only a more varied YES/NO mix, but also included a *modal* (most-common amount) of 3 answers to The Consultation’s 5 *optional* questions, compared to a *modal* of 0 from the aforementioned sources.

4. The high response volumes, data-entry patterns, statistically unlikely bias, notable absence of *optional* answers and *comments* written in the 3rd-person, from those sources, render them “exceptional” when compared with behaviour of the 1000s of other contributing internet addresses, of major ISPs.

The *Eclipse Internet* address and *Three Mobile* provided 70% of *all* the online responses and, in total, the 16 “exceptional” sources provided around 75% of the entire online response and 89% of the YES response.

The following breakdown shows consultation results by internet sources which provided 10 or more responses, regardless of whether they were YES or NO. “Exceptional” sources, whose %ages are shaded red, below, are those identified with a 99+% bias towards YES or NO:

Source	Total Responses	No	Yes	%No	%Yes	Average Number of Optional Answers
BT (86.191.254.24)	335	0	335	0.00%	100.00%	0.0
BT (86.191.249.97)	246	0	246	0.00%	100.00%	0.0
Spectrum (213.133.141.201)	174	0	174	0.00%	100.00%	0.2
Virgin Media (86.8.18.53)	161	0	161	0.00%	100.00%	0.0
O2 (WiFi)	100	0	100	0.00%	100.00%	0.0
Sky (78.105.216.10)	91	0	91	0.00%	100.00%	0.0
Sky (2.221.25.46)	82	0	82	0.00%	100.00%	0.0
BT (86.191.252.58)	72	0	72	0.00%	100.00%	0.0
BT (86.191.253.78)	41	0	41	0.00%	100.00%	0.0
BT (31.55.6.116)	31	0	31	0.00%	100.00%	0.0
BT (31.55.58.180)	20	0	20	0.00%	100.00%	0.0
Virgin Media (94.173.210.185)	16	0	16	0.00%	100.00%	0.0
O2 (82.132.221.105)	12	0	12	0.00%	100.00%	0.0
O2 (82.132.222.137)	11	0	11	0.00%	100.00%	0.0
Eclipse Internet (81.168.88.78)	5709	8	5701	0.14%	99.86%	0.3
Three	15073	55	15018	0.36%	99.64%	0.2
Non-UK	18	2	16	11.11%	88.89%	1.8
EE	93	21	72	22.58%	77.42%	2.6
Others (195.40.87.178)	12	3	9	25.00%	75.00%	2.9
Vodafone	42	14	28	33.33%	66.67%	3.3
O2	88	33	55	37.50%	62.50%	3.0
TalkTalk	471	272	199	57.75%	42.25%	3.0
Others	1667	1020	647	61.19%	38.81%	3.3
Virgin Media	2026	1292	734	63.77%	36.23%	3.4
BT	2083	1342	741	64.43%	35.57%	3.3
Sky	870	608	262	69.89%	30.11%	3.4

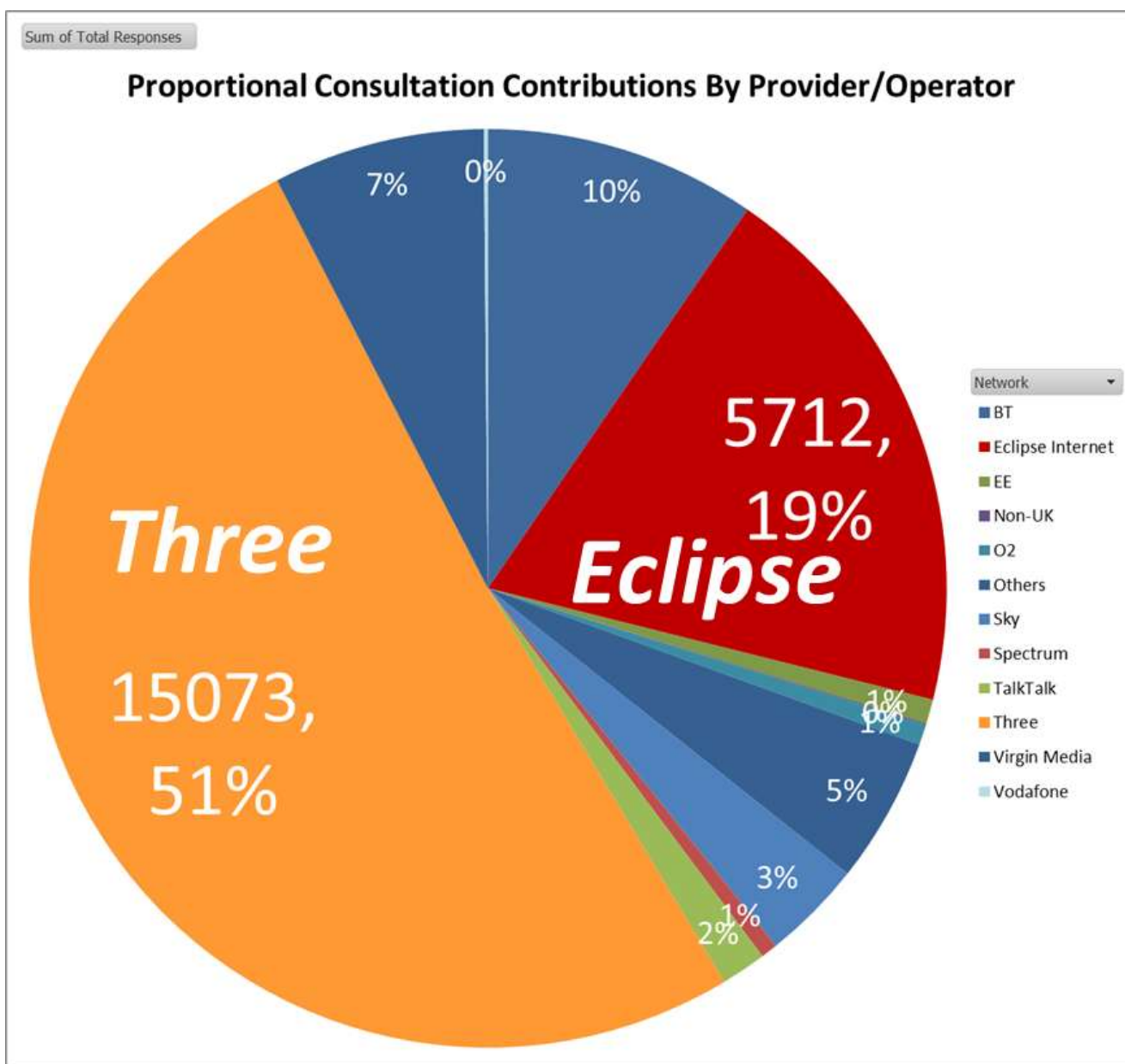
Individual IP-addresses, contributing 10 or more responses, are indicate in parenthesis, under *Source*

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5. For information: An *IP-address* consists of 4 number-blocks, each ranging from 0-255 (e.g. 81.168.88.78) and identifies an internet connection from, for example, a particular home or business. Your own broadband connection can be individually identified by its IP-address. It is the IP-address and timestamp information, which enabled detailed analysis of response-sources and their input-patterns, and which revealed clear evidence of “exceptional” sources batch-entering high-volumes of “yes” responses.

For example, *BT* IP-address, 86.191.254.24, generated 335 responses, over 10 consecutive days, exclusively in the evenings, every one of which was a YES. Similarly, *Sky* IP-address, 78.105.216.10, generated 91 “yes-only” responses in just 2 consecutive days, and only between 2.30pm and 3.45pm. This kind of information also revealed the exceptional high-volume, office-hours-only, minimal-detail response-pattern for *Eclipse* IP-address, 81.168.88.78

6. Response-volumes by network show just two providers, each with comparatively small UK market shares, generated 70% of the total online response:

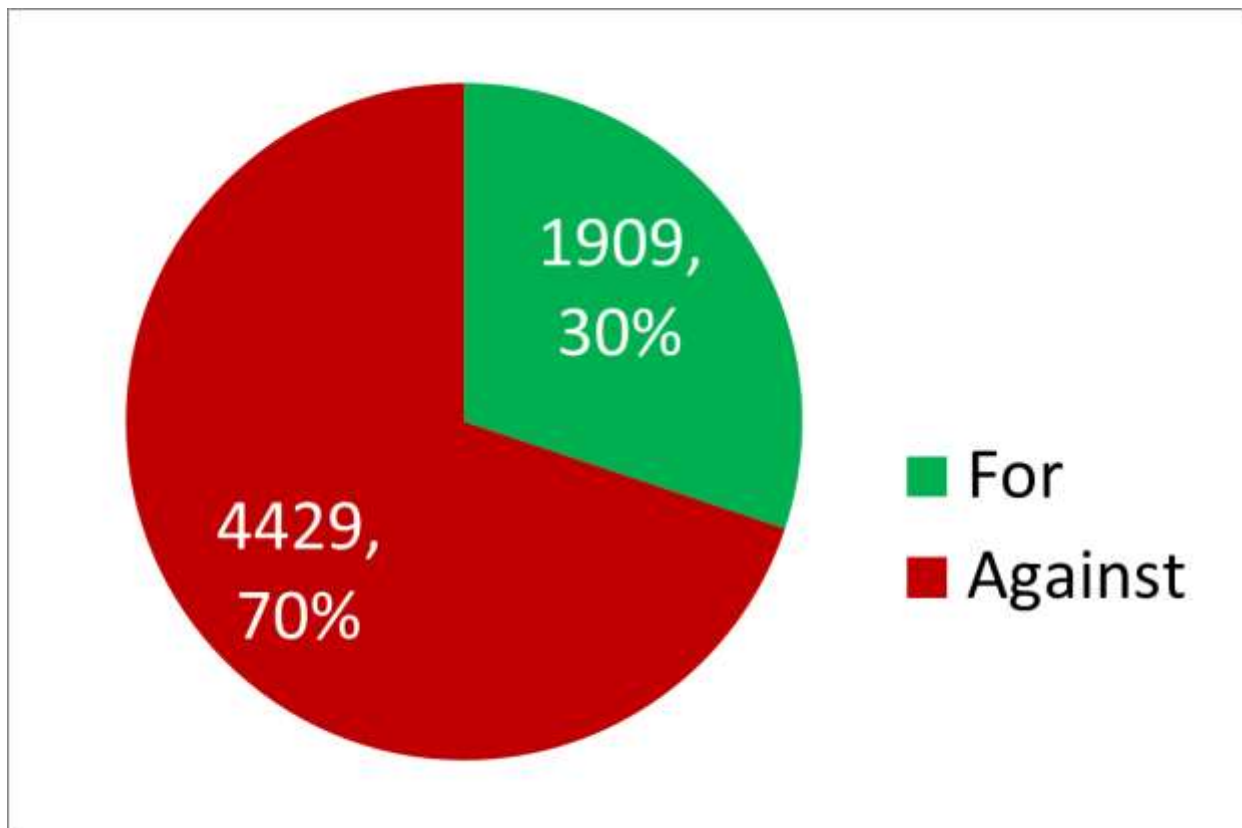


7. The following table & pie-chart shows LBB’s airport Consultation results after excluding “exceptional” sources, along with 1,032 responses for non-LBB postal addresses:

Source	Total	No	Yes	%No	%Yes	Average Number of Optional Answers
EE	62	21	41	33.87%	66.13%	2.4
Others (195.40.87.178)	6	2	4	33.33%	66.67%	2.8
Vodafone	30	13	17	43.33%	56.67%	3.4
O2	53	29	24	54.72%	45.28%	3.2
TalkTalk	411	263	148	63.99%	36.01%	3.0
Others	1359	958	401	70.49%	29.51%	3.4
Virgin Media	1889	1281	608	67.81%	32.19%	3.4
BT	1768	1275	493	72.12%	27.88%	3.4
Sky	760	587	173	77.24%	22.76%	3.4
	6338	4429	1909	69.88%	30.12%	3.2

Responses for non-LBB postal addresses have been excluded

Postal addresses are “approximate” due to removal of personal data, under terms of the Freedom of Information Act 2000



It should be noted that, in full accordance with the FOI Act, the LBB excluded all personally identifying information prior to sharing The Consultation data. Although an IP-address can be used to determine a *pattern* of response, it is considered as non-personal data, because *only* law-enforcement agencies and similarly-empowered bodies are able to use such information to actually identify individuals.

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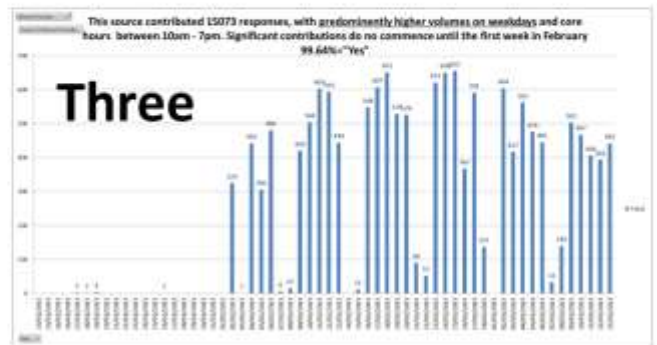
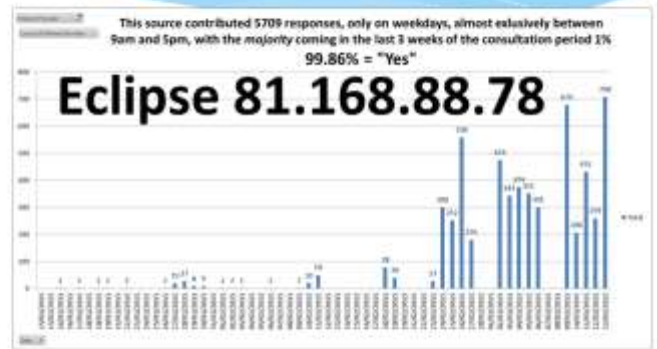
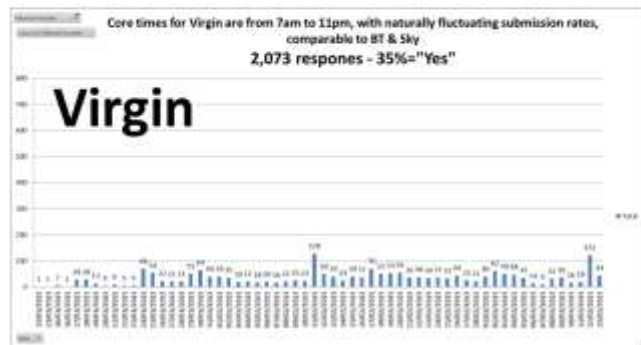
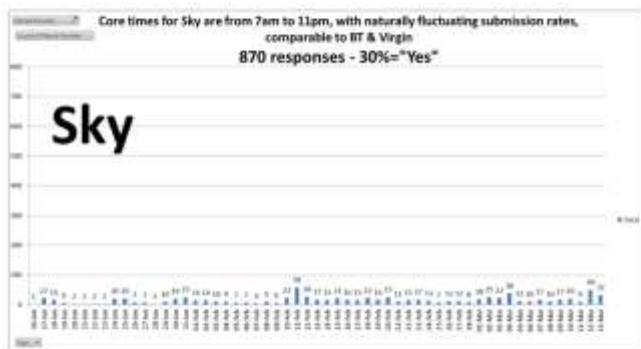
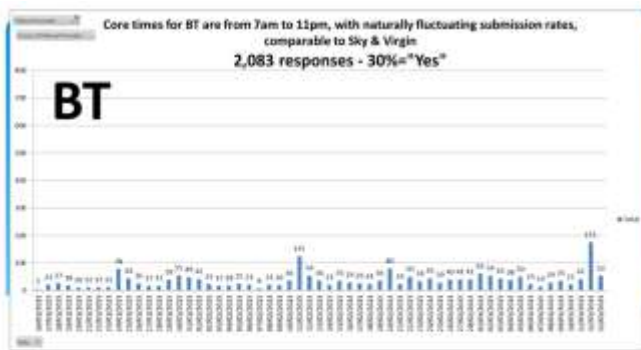
The Power-Point slide, below, shows the comparative response submission rates of BT, Sky & Virgin, vs those of the two biggest contributors, Three Mobile and a single Eclipse address.

The horizontal axis represents the entire consultation period, from 16th January to 14th March, 2015

The vertical axis is the same on each graph (0 to 800) and shows the daily consultation response-volumes from each source.

Although the individual figures are difficult to read at this resolution, three things are clear.

1. Major ISPs BT, Sky and Virgin all following similar, undulating patters, even sharing similar spikes on the 11th February and 12th March – believed to be caused by a press release or advert.
2. Eclipse & Three concentrate their contributions during the week (Eclipse, almost exclusively so)
3. The collective contributions from BT, Sky, and Virgin and dwarfed by those from the single Eclipse IP address. The same applies for the Three mobile network.



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