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Dear Justin

Next Generation Networks: Further Consultation

ACSP, which represents the members of the Federation of Communication Services that deliver fixed, mobile, Internet and content services to customers, welcomes the opportunity of responding to the above consultation. We have also commented on issues associated with the Next Generation Networks (NGNs) within our response to Ofcom's consultation on the BT Undertakings issued on 30 June 2005.

We recognise the importance of setting the rules and policy framework to manage the conversion of the UK telephony networks to NGN technology at an early stage and in general agree with the proposals set out in the above consultation.

In particular we would like to comment on the following specific questions.

Q2 Continuity for existing SMP products

We agree that it is imperative that BT continues to provide SMP interconnect products and services, and in particular WLR, following migration to 21CN and until such time as the next generation replacements are fully equivalent and fit for purpose for all BT's service provider customers.

Q3 Withdrawal of legacy SMP products

We caution Ofcom not to set strict time limits for withdrawal of legacy products but to go through due process so that service providers and users can register their views. Unless the new "equivalent" product is truly fit for purpose and available on commercially fair terms and conditions, service providers would be cautious about supporting the withdrawal of any legacy product or service.

Q 6 Issues to be considered by all CPs as they move to NGNs

We agree that it is important to address the wider issues associated with the proper functioning of NGNs, such as number portability, end to end call Quality of Service, emergency call prioritisation, and the maintenance of network intelligence capabilities. Service providers are dependent on their wholesale supplier for many of these services and would wish to be included in stakeholder work groups addressing these issues. These might be considered under the remit of NGN Co, if this becomes a cross-industry stakeholder forum, see below.

Q7 Consumer protection

We agree with the policy principles identified by Ofcom and would comment that the products delivered by service providers are tied to the quality of service provided by their wholesale supplier. Maintaining a communication programme with customers to explain the changes occurring as a result of new infrastructure and services for the UK will be an essential role for the whole communications industry and may be best carried out under the NGN Co to ensure a consistent cross-industry approach.

Q 9, 10, 11, 13, 15, 16 Co-ordinated action

It is clear that the move to and use of NGNs in coming years will impact the whole communications industry, including customers, UK consumers and UK plc, in one way or another. We believe that to have a single forum for the review of all cross-industry aspects of NGN developments would provide focus and direction to ensure the UK can take advantage of new products and services and enhance our international competitiveness. The forum would have to look at the big picture as well as detailed work groups on technical, commercial and consumer issues, some of which are described in the consultation. The move to NGNs, convergence and the interfaces required with other technologies (3G, 4G, WiMax, Tetra etc) delivering other services is too big a subject to be left just to the NGN infrastructure owners or vertically integrated companies.

We would recommend that "NGN Co" is a valuable concept that would merit development and suggest that Ofcom engages consultants to set out the scope, governance and to identify a champion. London 2012 developed such a process and succeeded - the communications industry could usefully follow this model to rise to this even greater challenge. Ofcom and the UK government would have to be fully involved to monitor developments and to be able to respond to problems as they arise. As a minimum the regulator would require the involvement of technical, commercial and consumer experts.

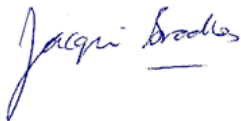
Q 15 NICC

ACSP has been represented on NICC since its formation and firmly believes that its work should continue. We appreciate Ofcom's reluctance to be responsible for NICC, but a close continuing relationship between Ofcom and NICC will be imperative for Ofcom to ensure a competitive regime and to counter any potential commercial leverage by the incumbent on a committee with its competitors. We agree that NICC should be responsible for standardisation of NGN interconnect. It will be for industry players to determine how NICC moves forward.

Q17 Operational adjudicator

We support the concept of an operational adjudicator and endorse the use of the industry scheme already in place - the Communication Providers Adjudication Scheme. This is operated in partnership with the Chartered Institute of Arbitrators. This could be a useful scheme to underpin the resolution of operational NGN issues as they arise.

Yours sincerely



Jacqui Brookes
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