

Marconi's response to Ofcom's Next Generation Networks Consultation

Marconi welcomes the opportunity to participate in the Next Generation Networks consultation, and makes the following general and detailed comments in response to the consultation process.

Vision

Marconi's vision is of a vibrant knowledge-based economy supported by a Next Generation Broadband Communications Infrastructure supporting a growing range of commercial, social and political activities and innovations.

As with previous generations of communications advances - canals, railways, phones, motorways - this will stimulate economic growth and deliver social and economic benefits in a wide range of diverse areas such as; efficiency gains for commerce and government, workforce mobility, transport relief, business model innovation, customer reach.

An essential enabler of a successful knowledge-based economy will be the development of the necessary Next Generation Infrastructure to support freely available, affordable access to broadband services, delivering adequate levels of availability, resilience and dependable quality of service.

General principles

In general Marconi's view is informed by four firmly held positions:

- Marconi believes that a competitive telecoms market is good for the UK.
- Marconi supports the principle of the minimum of regulatory intervention, used only where sustainable competition has not been established, or for issues such as number allocation that are beyond the scope of the market. Where sustainable competition has not been established, regulation should be focused only on underlying bottlenecks in network infrastructure.
- Marconi believes that every effort must be taken to ensure that innovation is not stifled - the regulatory and market framework must be able to support the investment required to deliver the Next Generation Telecommunications Infrastructure needed by a successful knowledge driven economy.
- Marconi believes that it is essential to ensure that the UK Next Generation Telecommunications Infrastructure is capable of delivering adequate levels of availability, resilience and dependable quality of service.

Response to the Next Generation Networks consultation questions

In the following response, Marconi has made no comment on those questions that touch on areas remote from our area of expertise in the value chain and/or where they touch on the business of a specific Marconi customer.

Question 1: Do you agree with Ofcom's proposed approach for the charges of narrowband voice SMP products provided over next generation interconnects?

No comment.

Question 2: Do you agree with the overall approach that there needs to be continuity for existing SMP products, but that it would not be appropriate to continue them indefinitely?

Marconi agrees with Ofcom's overall approach that it is essential to ensure continuity for existing SMP products in the short/medium term, but that it is unlikely to be efficient to continue them indefinitely. However, to drop such products too soon would be unfair to those operators who have made significant investments on the assumption of continued deployment of existing network technologies and architectures.

Question 3: Do you agree with the general criteria Ofcom has proposed for the withdrawal of legacy SMP products after an interim period?

Marconi agrees with the general criteria proposed for the withdrawal of legacy SMP products, but believes that consultation with end users should be part of the process of determining the acceptability of withdrawal.

Question 4: Which network intelligence capabilities are likely to be associated with the underlying network where BT has SMP and cannot be independently provided by alternative providers, and why?

Marconi broadly agrees with Ofcom's assessment of network intelligence capabilities likely to be associated with the underlying network, as laid out in appendix G to the consultation document.

In addition to the individual capabilities outlined in appendix G, it may also be necessary to consider bundles of capabilities that are likely to be aimed at specific areas – for example fixed-mobile convergence.

Question 5: What are your views of the practical implications of applying Equivalence of Input to NGNs?

Given that Equivalence of Input is a core component of the Equality of Access policy, it is important that instances of NGN SMP products where EoI does not apply should be on an exceptional basis, and only accepted after debate and consultation. There is otherwise a danger that confidence in the Equality of Access policy will be undermined.

Question 6: Do you agree with the issues Ofcom has identified that need to be addressed by all communication providers as they move to NGNs and what others are there?

Marconi broadly agrees with the issues Ofcom has identified but notes that some of the issues are described in terms of "voice calls". It is important that these issues are also considered in the wider context of the broad range of other services that are likely to be offered over NGNs.

Question 7: Do you agree with the policy principles Ofcom has identified for consumer protection during the move to NGNs?

No comment.

Question 8: Do you agree with the overall process for developing 21CN obligatory products?

Marconi broadly agrees with the overall process described.

Question 9: Do you believe there is a need to co-ordinate and steer cross industry NGN issues which is not met by existing bodies and processes?

Currently there are two bodies involved in the co-ordination and steering of NGN issues – NICC and Consult 21. NICC is able to cover the generation of agreed technical standards but is not able to address wider issues. Consult 21 is a BT initiative, established to consult with BT wholesale customers on the implications of 21CN and with membership restricted to those customers. Within this framework there is clearly a lack of an impartial body, able to address wider issues and representing the wider community of NGN stakeholders.

Question 10: Do you agree there is a need to co-ordinate the planning and implementation of NGNs on an industry wide basis?

Marconi agrees that there is a need for industry wide co-ordination.

Question 11: Is there a need for a process to address the wider consumer protection issues arising from the move to NGNs?

In order for consumers to be able to make informed choices, it is important that processes are in place to ensure that consumers fully appreciate the characteristics and implications of the available offerings. In particular, similar service offerings over NGNs are likely to cover a wider range of availability, reliability, resilience and security than is currently the case.

Question 12: Has Ofcom identified all the correct industry processes that will be needed to deal with the move to NGNs?

Marconi believes that Ofcom has identified the main issues and areas that will require co-ordination. There is a concern that the relationship and roles of the proposed co-ordination bodies are unclear. In particular it is important that NICC should not have to make judgements on the relative priorities of requests for standards work coming from different sponsors. There is also a concern that the consultation suggests that whilst NICC should be responsible for NGN technical standards, the responsibility for technical architecture work lies elsewhere, it is not clear that such a separation would prove to be workable.

Question 13: Do you agree that it is appropriate for Consult 21 to continue to take responsibility for developing detail of SMP product migration and development of new products?

Marconi agrees that it is appropriate for Consult 21 to continue to take responsibility for developing detail of existing SMP product migration. It is less clear that Consult 21 is an appropriate forum for the development of new products. Within the framework proposed by the consultation document, this role would seem to naturally fall to NGNCo.

Question 14: Do you agree that Consult 21 combined with bi-lateral commercial negotiation and backed up by Ofcom dispute resolution is the best approach to agreeing the commercial aspects of new and migrated products?

No comment.

Question 15: Do you agree that NICC should continue to be responsible for standardisation of NGN interconnect, but needs to be re-constituted as an independent industry owned body?

Marconi agrees that NICC should continue to be responsible for standardisation of NGN interconnection and interoperability. Work in this area by NICC is already well established and is supported by active Marconi participation.

Marconi is not convinced of the need to re-constitute NICC as an independent industry owned body.

In the event that Ofcom is unwilling or unable to continue the currently provided support services – Secretary and Work Programme Manager, liability and copyright ownership, website provision – then alternative arrangements must quickly be reached. The current arrangement is efficient and an alternative could increase overall costs whilst not delivering any particular advantages. In particular the current membership of NICC does not include resources and skills of the kind that would be required to establish NICC as a new legal entity.

Question 16: What are your views on the establishment of a new multi-lateral industry group to address NGN issues, its terms of reference and governance arrangements?

The consultation document is unclear about the role of the proposed new multilateral industry group "NGNCo" and about its relationship with the other NGN co-ordination bodies – Consult 21 and NICC.

As a forum for addressing wider issues arising from NGN deployment, it would need to have a senior position and to include an appropriate range of stakeholders such as service providers, end users, business users, equipment suppliers and Government.

Question 17: What are your views on the establishment of an NGN operational dispute adjudicator, its terms of reference and governance arrangements?

No comment.

Question 18: Would your organisation be prepared to sign-up to such an adjudication scheme and abide by the adjudicator's decisions?

It is not expected that Marconi would be directly subject to such a scheme in its role as an equipment and associated services supplier.

John Newbold
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