

Question 1: Given recent developments, do you agree that Ofcom's focus should be on the following three objectives in developing our policy for VoIP services, namely (in so far as is possible) (i) enabling innovation in a technological neutral way, (ii) ensuring consumers are well informed, and (iii) ensuring maximum availability of 999 services? : Yes, provided that appropriate guidance and recommendations are provided to public users on the risks associated with acoustic shock injury and the potential for this when using VOIP services. (refer to Skype own discussion boards on this subject)

Question 2: Do respondents agree with this approach for the interaction between network providers and PATS providers? : yes

Question 3: Do you agree that the limitation of GC 3 obligation to providers of service at a fixed location is not sustainable in the long term? What views do you have on how this may be addressed? : no comment

Question 4: In light of the other measures proposed in this document, are there particular issues in relation to VOIP services that should be addressed in this review? : Yes, the provision for open competition, the security of voip traffic and the availability of broadband services.

Question 5: Are there particular issues in relation to VoIP services that should be addressed in this review? : Yes, the health and safety issues associated with acoustic shock injury. The current out of court settlements in call centres is 10 mill and rising. IN VOIP applications the headset types used with PC's do not offer any protection unlike call centre headsets.
The availability of in line devices for use with VOIP systems and any headset type (e.g. Soundshield) should also be addressed.

Question 6: Do you have any comments on Ofcom's proposed modification to the PATS definition in GC 18? : No

Question 7: Do you agree with the proposed application of the code? : Yes

Question 8: Do you agree with the proposed approach for informing consumers that services may cease to function if the broadband connection fails or there is a power cut or failure? : Yes, but it is important that the delivery of broadband services meets defined service levels i.e. the provision of broadband services does not become a competition restriction.
Also very important that broadband services do not become operator specific e.g. if using Cable and wireless broadband you can only use cable and wireless vOIP services.

Question 9: Do you agree with the proposed approach for informing customers where access to emergency calls is not available? : yes but in reality more emergency calls are now delivered through mobile than any other media.

Question 10: Do you agree with the proposed approach for informing consumers that access to emergency calls may cease to function if the Data Network fails or there is a power cut/failure? : yes.

Question 11:Should the code be extended to point of signature acknowledgement in respect of reliability of access to emergency calls?: yes

Question 12:Do you agree with the proposed approach to location information providers where the service does provide access to emergency calls? In particular, do you believe that subscribers should be required to register their main location prior to activation of the service?: yes, very important and not difficult to do. This could be made a condition of sign up.

Question 13:Do you agree with the proposed approach to informing consumers where services do not provide emergency location information?: yes

Question 14:Do you agree with the proposed approach to informing customers where services do not provide number portability? : yes

Question 15:Do you agree with the proposed approach to informing consumers about the types of facilities that might not be available, but which they have come to expect from a telephone service ?: yes, but slowly these are manifest in VOIP anyway with services growing and exceeding telephony capability on a daily basis.

Let the user/consumer decide. Why try and taint this process.

Question 16:Do you agree with Ofcom?s view that all aspects of the code of practice should be mandatory?: yes.

Question 17:Do you consider that the overall programme of activities is appropriate?: no comment

Question 18:In light of Ofcom?s Consumer Policy Review, are there other consumer education measures that Ofcom should consider?: yes, on the health and safety aspects of acoustic shock.

Question 19:Do you have comments on this proposed enforcement approach?: no comment

Question 20:Are their other areas of research activity that Ofcom should consider to ensure it understands market developments ?: no comment

Question 21:In relation to ensuring high availability of 999 access, are their other measures that Ofcom could consider?: no comment

Question 22:Do you agree with Ofcom?s approach to naked DSL?: no comment

Question 23:Do you agree a cross industry meeting would be a useful approach to move this issue forward? What other steps could be taken to provide support for 056 numbers?: no comment

Question 24:How can a VoIP call be traced for detection and prevention of malicious and nuisance calls? How could a suitable call screening service work in a VoIP network?: If voip is controlled through persons allowing other callers to call

them e.g. people must request authority to be on your call list then this becomes a none issue.

You could only receive a call from a known source.

So to use VOIP for a service then registration become mandatory.

Question 25:Do you agree that SPIT could be a potential problem and what techniques can be used to minimise the impact of SPIT on consumers of VoIP services?: No comment

Question 26:Have there been any instances of a VoIP service being compromised or used to deliver malware or a DoS attack?: do not know?

Question 27:Are there any other considerations that need to be taken into account when a provider does not have a UK entity?: no comment

Question 28:Is it reasonable to ask VoIP service providers to participate in schemes designed for e-commerce ?: yes.

Question 29:Do you have any other comments on the proposed approach to investigating the application of the GCs applicable to providers of PATS in the context of VoIP?: no comment

Question 30:Do you have any comments on Ofcom's views on the meaning of abovementioned terms and legal concepts?: no comment

Question 31:Are there any other steps that a VoIP service provider could consider in respect of the IP network layer and service application layers to ensure network integrity?: no comment

Question 32:Are there any other steps that a VoIP service provider could consider in respect of parts of the underlying network that they do not control?: have very stringent broadband service delivery standards.

Question 33:What additional steps could a VoIP service provider take to support nomadic users with regard to maintaining network integrity?: not a lot. POver failure will always be an issue.

Question 34:Do respondents consider whether other options to ensure continuity in the case of a power outage are appropriate?: Do not know what can be done here other than everyone having USP's and that is impractical for the public but may be considered for business /corporate users..

Question 35:What other steps could be taken to provide reliable location to assist the emergency services in their work ?: not sure

Question 36:What other steps could be taken to provide reliable location to assist the emergency services in their work in the case of nomadic users?: not sure

Question 37: In addition to participating in the NICC working group on providing location in IP networks and the 112 expert group, what other steps should Ofcom take?: no comment

Additional Comments: The rise in VOIP is a fantastic benefit to all. It is vital that the infrastructure providers are not allowed to restrict the voip services available through their own broadband offerings.