

From: webform@ofcom.org.uk
Sent: 10 May 2006 3:28 AM
To: Robindhra Mangtani
Subject: Responding to this consultation

Title: Mr

Forename: Konstantin

Surname: Kropivny

Name and title under which you would like this response to appear: Konstantin Kropivny, PhD

Representing (self or organisations): Organisation

Organisation Name : Digifonica International

Email Address: kkropivny@digifonica.com

Nothing: Yes

Whole Response: No

Name-Contact details/job title: No

Organisation: No

Part of the response: No

If there is no separate annex which parts?:

Response Summary: Yes

Read Declaration: Yes

Publish After Consultation: Yes

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 on all 3

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? : yes I do. Although all "fixed location"

services can be provided at "nomadic locations" if customer is informed about possible "critical national infrastructure" failures.

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 ? : no

Question 5: Are there particular issues in relation to VoIP services that should be addressed in this review ? : no

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

Question 9: Do you agree with the proposed approach for informing customers where access to emergency calls is not available ? : no. Technology allows to forward short-dialed numbers (999) to the Emergency Response Center, responsible for that user location.

This is ofcom responsibility to demand from providers to provide emergency calling from every location.

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 on the 1st.
no on the 2nd, customer should have a choice to register or not, and should be informed on consequences

Question 13: Do you agree with the proposed approach to informing consumers where services do not provide emergency location information?: no, services should always provide the possibility to submit emergency location information, if subscriber wants to.

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

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?: yes

Question 18:In light of Ofcom's Consumer Policy Review, are there other consumer education measures that Ofcom should consider?: no

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

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

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

Question 22:Do you agree with Ofcom's approach to naked DSL?: yes. Although PSTN connection is not more reliable than ADSL. I know few cases when PSTN was down although ADSL was up. And it was provisioning mistake, not hardware failures.

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?: yes

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?: VoIP call can be traced back to the caller either he is on-net, or off-net - in the next provider network. Technology is available to provide that. Providers have to cooperate in tracing these calls, and ofcom responsibility is to enforce this. User should have interface to request tracing.

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, SPIT is not a problem if VOIP provider can trace every call to the originator or to the gateway to the next provider. Again, it's about

- cooperation of providers
- ofcom ruling to enforce that
- simple user interface to check recent calls in real-time, and request tracing & blocking

Question 26:Have there been any instances of a VoIP service being compromised or used to deliver malware or a DoS attack?: probably yes, like any other computerized system.

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

Question 28:Is it reasonable to ask VoIP service providers to participate in schemes designed for e-commerce ?: yes for account management & payments
no for actual call setup/teardown and audio stream

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

Question 30:Do you have any comments on Ofcom?s views on the meaning of abovementioned terms and legal concepts?: nomadic locations must have the same service features and requirements as the fixed locations. Users just must be informed of potential disruptions of data transport or power infrastructure

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?: most of those steps are listed and well-known to professionals

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?: no, other than provide redundant circuits to the same locations. SLA is enough.

Question 33:What additional steps could a VoIP service provider take to support nomadic users with regard to maintaining network integrity?: nothing other than inform users

Question 34:Do respondents consider whether other options to ensure continuity in the case of a power outage are appropriate?: no

Question 35:What other steps could be taken to provide reliable location to assist the emergency services in their work ?: -

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?: -

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?: -

Additional Comments: VOIP providers must be considered and treated as PSTN providers with all standard requirements:

- Emergency Services
- Lawful Intercept
- malicious calls and SPIT user protection

The following items must be addressed and users informed:

- location for emergency services is user responsibility to keep upto date
- number portability is provided by local telco, VOIP providers have to rely on that
- underlying network and power infrastructure failures, which are beyond of VOIP provider control