

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

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. No.

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? :

Question 5: Are there particular issues in relation to VoIP services that should be addressed in this review? :

Question 6: Do you have any comments on Ofcom's proposed modification to the PATS definition in GC 18? :

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

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? :

Question 9: Do you agree with the proposed approach for informing customers where access to emergency calls is not available? :

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? :

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

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? :

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

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

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 ?:

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

Question 17:Do you consider that the overall programme of activities is appropriate?:

Question 18:In light of Ofcom's Consumer Policy Review, are there other consumer education measures that Ofcom should consider?:

Question 19:Do you have comments on this proposed enforcement approach?:

Question 20:Are there other areas of research activity that Ofcom should consider to ensure it understands market developments ?:

Question 21:In relation to ensuring high availability of 999 access, are there other measures that Ofcom could consider?:

Question 22:Do you agree with Ofcom's approach to naked DSL?:

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?: You could make it clear what charge rate applies to 056 numbers. Or create a national rate (not 0870 rate) VoIP number block that providers have to charge at the same or no higher rate than 01 and 02 number blocks.

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?: I guess you are going to have to require providers to keep very detailed logs of calls.

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?:

Question 26:Have there been any instances of a VoIP service being compromised or used to deliver malware or a DoS attack?:

Question 27:Are there any other considerations that need to be taken into account when a provider does not have a UK entity?:

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

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?:

Question 30:Do you have any comments on Ofcom?s views on the meaning of abovementioned terms and legal concepts?:

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?:

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?:

Question 33:What additional steps could a VoIP service provider take to support nomadic users with regard to maintaining network integrity?:

Question 34:Do respondents consider whether other options to ensure continuity in the case of a power outage are appropriate?:

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: I work as a Network Manager of a UK based firm with approximatly 5500 staff. We are deploying VoIP to part of our business. This response is my personal view not a company response.

CLI and access to emergency services have already become an issue for my firm as our team are going to be moving buildings and we will be using VoIP over our network to get all our calls as we are unlikely to have a PSTN gateway for a while in the new building. We also have a team in Liverpool using a PSTN gateway in Surrey. I have so far blocked emergency calls from the desk phones to stop it causing problems. Not sure if we should do the same for the new building as it is only 2 miles away.

Current IP address location services do not seem to work. I have seem network addresses that are based in Surrey being reported as in Southampton. This is even with the correct details being contained in the RIPE database. Also privacy issues/acceptable use issues to overcome with providing that data. Also we are only planing to have one internet gateway for the company which will serve more than 50 sites in the UK.