

BASIC DETAILS

Consultation title:

New Voice Services

To (Ofcom contact):

Justin Moore

Name of respondent: Representing (self or organisation/s):

Manjit Birak

WaveCrest (UK) Ltd

CONFIDENTIALITY What do you want Ofcom to keep confidential?

Nothing

DECLARATION I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and all intellectual property rights in the response vest with Ofcom. If I have sent my response by email, Ofcom can disregard any standard email text about not disclosing email contents and attachments.

Ofcom can publish my response:

Once the consultation ends

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New Voice Services

WaveCrest's response to Ofcom's consultation

WaveCrest welcomes the opportunity to respond to the Ofcom consultation on New Voice Services

Summary

Annex 3

Consultation questions

Section 3

Question 1: What types of new voice services do you envisage becoming available in the future and what characteristics will they have that distinguish them from traditional voice services?

Agree with Ofcom's findings, see section 3

Section 4

Question 2: What are the main policy challenges raised by the introduction of new voice services for consumer protection and regulation?

Agree with Ofcom's findings, see section 4

Question 3: Do you agree with the initial top level aims identified by Ofcom?

Yes

Question 4: Are there other aims and criteria that Ofcom should consider?

No Comment

Question 5: Are there other key policy questions that Ofcom should be considering?

No Comment

Question 6: Do you agree with Ofcom's initial view that it is not necessary for all voice services to provide the same standard features as traditional telephone services, and that we should instead focus on enabling consumers to make informed decisions?

Yes

Question 7: Do you agree with Ofcom's initial view that it is not desirable to draw a distinction between the regulation of services that look like traditional services and those that do not?

Yes

Question 8: Do you agree with Ofcom's initial view that a distinction should not be drawn between the regulation of 'second line' services and 'primary' services?

Yes

Question 9: Do you think that a threshold should be set at which new voice services should be required offer the same features as traditional voice services? If so, how should the threshold be set?

No

Question 10: Do you agree that most providers would want to offer at least a basic form of access to 999?

Yes

Question 11: Do you agree with Ofcom's initial view that consumers sufficiently value having access to 999 in order for them to wish to retain at least one means of 'high quality' (very reliable) access to 999 at home?

Yes

Question 12: Do you agree with Ofcom's initial view that not all voice services should be required to offer access to 999 but that decisions about subscribing to and using such services must be properly informed?

Yes

Question 13: Do you agree with Ofcom's initial view that given some new services may not be able to offer the same degree of reliability for emergency calls as traditional voice services, it is better that these services are able to provide less reliable access to 999 rather than preventing them from offering any access at all?

Yes, the Provider should decide what quality of 999 service they are likely to offer, if any.

Question 14: Do you agree with Ofcom's assessment of the costs and incentives for providers offering PATS?

Yes

Question 15: Do you agree with Ofcom's understanding of the implications of the definition of PATS contained in the Directives?

Yes

Question 16: Do you agree with Ofcom's understanding of the implications of this alternative approach?

Yes

Question 17: Are there policy initiatives in other areas related to new voice services that Ofcom should be considering?

No Comment

Section 5

Question 18: Although Ofcom is not consulting on its interim position, it would welcome your views on its interim policy to forbear from enforcing PATS obligations against new voice services which offer access to 999.

Prefer the flexible approach where the Provider chooses to offer PATS or not

Section 6

Question 19: Is it reasonable to have different network integrity requirements for nomadic services compared to services at a fixed location, and how should consumers be made aware of this difference?

Yes, allocate geographic numbers for fixed locations and 056 numbers for nomadic locations

Question 20: Do you think that it is better for Ofcom to:

1. Retain the Essential Requirements Guidelines in their current form;
2. Re-issue the Essential Requirements Guidelines, incorporating additional guidance in relation to Voice over Broadband and Next Generation Networks; or
3. Withdraw the Essential Requirements Guidelines, and apply the 'reasonably practical' test set out in General Condition 3

Option 3

Question 21: Do you think that there are reasonably practical measures that providers at a fixed location can take even if they do not directly control the underlying network?

No, impractical to enforce SLAs

Question 22: What in practice should the roles of the network provider versus the service provider be for network integrity when the network provider has no control over the services offered over their network?

No comment

Question 23: Do you agree that it is likely to be reasonably practical for analogue telephone and ISDN2 services to provide line powering but not other services?

Yes

Question 24: What are your views on the technical feasibility of providing location information for nomadic services, both now and in the future?

Only need to update location information if located there for a reasonable period of time, no need if location is temporary

Question 25: What approach for emergency location would take account of current technical limitations, whilst ensuring that technical advances bring benefits to emergency organisations in the long run?

Agree with Ofcom, see paragraphs 6.34, 6.35 and 6.36

Section 7

Question 26: Do you agree that consumer information is required where services look and feel like a traditional telephone service but not where services are clearly different (e.g. PC based services)?

Yes

Question 27: Do you agree with a two stage approach to consumer information, first to ensure the purchaser is aware of the nature of the service at the point of purchase, and second to ensure all potential users are aware the service does not provide access to 999 at the point of use?

Yes

Question 28: If consumer information is required to ensure that consumer interests are protected, which of the above frameworks regulatory framework, if any, is appropriate to ensure it is successful?

Self-regulatory