

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

**Consultation title:** Next Generation New Build Consultation

**To (Ofcom contact):**

**Name of respondent:** Stephen R Hearnden

**Representing (self or organisation/s):** Intellect

**Address (if not received by email):** Stephen.Hearnden@Intellectuk.org

### CONFIDENTIALITY

**What do you want Ofcom to keep confidential?**

Nothing

Name/address/contact  
details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

Note that Ofcom may still refer to the contents of responses in general terms, without disclosing specific information that is confidential. Ofcom also reserves its powers to disclose any information it receives where this is required to carry out its functions. Ofcom will exercise due regard to the confidentiality of information supplied.

### DECLARATION

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Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name **S R Hearnden**

Signed (if hard copy)

## **Intellect response to the Ofcom consultation on 'Next Generation New Build'**

### About Intellect

Intellect is the UK trade association for the IT, telecoms and electronics industries including the fixed, mobile and satellite telecommunications industries. Its members account for over 80 per cent of these markets and include blue-chip multinationals as well as early stage technology companies. These industries together generate around 10 per cent of UK GDP and 15 per cent of UK trade. For more information about Intellect go to: <http://www.intellectuk.org>

### Introduction

Intellect's membership includes companies that supply the network operators as well as companies that are heavily involved in the manufacture of these services.

Intellect has consulted widely amongst its membership in producing this response text, to which a significant number of our members have provided specific inputs.

*Question 1: What can Ofcom do to encourage timely standards development for new build NGA wholesale access products and interfaces? Which industry body is best placed to undertake the standardisation of these products and interfaces? What action should Ofcom take if these standards fail to materialise?*

The industry would benefit from a set of internationally agreed standards and experience of other countries for both products and interfaces. To benefit from the studies of ITU-T SG6 (Outside Plant and Related Indoor Installations) will be very useful. However, it does not want to see delay in the introduction of these standards. Ofcom should as a matter of urgency call for organisations to come forward to undertake this work. Should this not happen quickly then Ofcom should undertake this work under contract.

*Question 2: Do you agree with Ofcom's approach to promoting competition and consumer choice in new build fibre access deployments?*

Intellect agrees with the approach of supporting competition and giving consumer choice. Intellect should support competition, market should decide for new players, doors should be open if there is more than one volunteer investor.

Question 3: Do you

*(a) believe that the existing obligations must be met by replicating the existing copper products, or that an alternative approach could be satisfactory? What are the implications of replicating existing products on fibre?*

Intellect agrees with the paper's assumption that it would not be proportionate to require copper networks to be built out but this does require careful attention to the wholesale product offerings. Also there needs to be sufficient attention given to the development of new products and services to replace those currently requiring a metallic connection. Relevant international standards and experience of other countries will be very useful.

*(b): agree that SMP holders rolling out fibre do not need to roll out a copper network in parallel solely to meet their LLU obligation?*

Agree

*(c): agree with Ofcom's approach in relation to WBA and new build areas?*

Agree

*(d): believe that the WLR obligation must be met by replicating the existing copper product, or that an alternative approach based on an ALA type product would be satisfactory?*

Intellect believe that the ALA type product approach meets the requirements

*(e): believe that the CPS obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?*

Intellect believe that the ALA type product approach meets the requirements

*(f): believe that the IA obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?*

Intellect believe that the ALA type product approach meets the requirements

*(g): agree with our proposal to interpret GC 3.1 (c) as being met through the provision and use of a battery backup facility to maintain uninterrupted access to emergency services in new build developments?*

Intellect strongly believes that a battery backup facility to maintain uninterrupted access is the correct solution. However even rechargeable batteries don't maintain their charge for ever and consumer awareness campaigns need to be set up much in the way the Fire services do on smoke alarm batteries.

Question 4: Do you think access to the duct network, including non telecoms duct, is a potentially feasible means of promoting competition in new build? If so what types of commercial and operational models could successfully support such access arrangements in the UK?

All opportunities should be explored to ensure the quickest and most cost effective solutions are employed. Also the current duct networks are often based on historical topologies and where new ducts are required, the opportunity should be taken to optimise the new duct routes.

-----end of response text-----