

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?:

Motorola strongly supports the ALA proposal based on connections using Ethernet because, overall, it is far more likely to encourage communications providers operating at the retail level to enter the market than any proposal that requires communications providers to install equipment in all exchanges before they can participate.

To encourage this Motorola asks Ofcom to support the establishment of a formally constituted Memorandum of Understanding (industry group) to look into all these issues with a view to promoting the establishment of the network. Technical standardisation can of course take place in NICC once the essential facilities have been established.

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

Motorola does not agree that access at the passive level is necessarily the best choice. In terms of deployment cost and thus likely percentage of the population addressed, G-PON represents a better deal for the UK. Thus we believe that the regulatory preference should be towards a neutral approach.

Question 3a: 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?:

In general, policies that are constrained to merely replicate obsolete products appear inappropriate. In this case, fibre is most certainly not the same as copper with a completely different service mix and business proposition.

There are even limitations on fibre that are greater than with copper. For example, the cost of the civils during deployment can be very much higher with fibre because the bending radius of the fibre cable once many strands are sheathed together in a bundle is very big. Additionally, with bundled fibres, the physical size of the street furniture needed could be much bigger than can be accommodated in many locations, necessitating the purchase of land from householders or digging additional man holes etc. were that approach taken. Space at the local exchange is also potentially a bottleneck to competition if these larger equipments are to be required.

The obligations placed are not, we believe, such as to force any such decision and so we very much advocate that they can be met using ALA and with interconnection at the Ethernet level with an appropriate set of essential facilities required to be made available at every interconnect point.

Question 3b: Do you agree that SMP holders rolling out fibre do not need to roll out a copper network in parallel solely to meet their LLU obligation?:

Yes. However, we do request that this is left to the discretion of the operator as there are situations where they may choose to do so voluntarily.

Question 3c: Do you agree with Ofcom's approach in relation to WBA and new build areas?:

No comment.

Question 3d: Do you 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?:

An approach based on ALA may indeed be preferable to many market actors.

Question 3e: Do you 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?:

A modern logical approach based on an alternative fibre approach is expected to become at least as popular as the current copper product.

Question 3f: Do you 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?:

It is not clear on what basis it could be claimed that this facility could not be provided in an active network. We therefore do not believe it is necessary to mandate that the fibre exactly replicates the copper product.

Question 3g: Do you 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?:

Yes.

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?:

As a manufacturer of equipment, Motorola prefers to refrain from discussing providers? and operators? commercial models.

Comments:

Key Points

1. Motorola firmly believes that the current public debate on competition is far too narrowly focussed. It would appear natural that all the issues relating to the promotion of a healthy competitive environment should be included. Thus it is not just about the supposed benefits of forcing potential Communications Providers operating at the retail level to locate their own (possibly physically large) equipment in every appropriate exchange. It is surely just as important to encourage potential communications providers by permitting very easy and unfettered access to their customers obviating the need to have all this capital expense. Thus an 'active access' mechanism whereby communications providers may gain customers through a properly provisioned interconnect interface which can be located at a more convenient place may well prove much more attractive.
2. The questions in the consultation ask views whether an ALA product can be made satisfactory. Motorola very strongly believes ALA solutions can meet all genuine requirements.
3. Motorola strongly urges the rapid establishment of a formal industry group to develop interface standards based on Ethernet and which include definitions of the minimum essential facilities needed to perform interconnect. Whilst NICC can develop the technical matters there is need for the list of essential facilities to be created. That may require input from a wider grouping before the outcome can be passed to NICC for implementation into the standards.