

Response of the FCS to the Ofcom Consultation:

**Very Low Bandwidth Leased Lines
(Part of the Business Connectivity Market Review)**

Professional Radio Communications (Business Radio)

FCS – August 2015

Contact for response:

Tim Cull, Head of BR, FCS

Federation of Communication Services Ltd
Burnhill Business Centre,
Provident House,
Burrell Row,
Beckenham, Kent
BR3 1AT
Tel: 020 8249 6363
E-mail: fcs@fcs.org.uk
Web: www.fcs.org.uk

Introduction

The Federation of Communication Services is the UK trade association for the professional communication services sector. Our 400 members and associates deliver voice and data functionality and services to business and public sector users by means of copper, fibre and radio transmission infrastructures. We are pleased to have the opportunity of responding to the Ofcom Consultation on Very Low Bandwidth Leased Lines.

The Fundamentals of the FCS Position

The FCS notes that a very high proportion of control telemetry for the successful operation of critical National Infrastructure is low bandwidth. In simple terms, this telemetry comprises of a relatively small number of small amounts of data, all of which is extremely important and which therefore requires very high resilience systems.

The design criteria for these types of systems are completely different from that which is found in systems delivering consumer services. Best practice has been worked on by the FCS membership for decades and has reached an extremely high level of achievement.

Today, the telemetry is carried over a variety of backhaul arrangements including very low bandwidth leased lines.

At first sight then, the withdrawal of these services could present the entire UK with a serious problem. However, as the consultation document points out, there has already been a significant amount of notice that these services may in the future be withdrawn. Furthermore, the proposed date of 2020 provides a further period for the professional communications industries to smoothly transition their customers onto alternative systems (when these are identified).

The FCS notes that the situation today is extremely complex in that the data requirements of at least some operators appear to be transitioning to require rather higher data rate services. Thus in a 5-year time-frame (to 2020), we expect the need to have changed anyhow, at least to a significant degree. It appears impossible to accurately predict the position in 5 years time.

The exact nature of the criticality of the future telemetry requirements is open to question. It will always be the case that the signalling must be correctly transmitted and received within the specified limits on timings, resilience and reliability. However, exactly how this can be accomplished in the future requires further study. The difficulty is in predicting what has to be done to re-establish the necessary resilience etc. on a newer platform. This is especially important in a climate when all the systems are changing to meet market demand¹.

In consequence, the FCS membership prefers to adopt a position of acceptance that the existing services will be withdrawn in 2020 (approximately), without raising objections at this stage which would be very difficult to substantiate.

Between now and 2020, the FCS membership will seek to identify alternative techniques to meet the operational requirements of these critical users. On the basis of this study, the industry will be able to make the appropriate decisions.

¹ By way of an illustration, the reader might consider whether a voice call made on a 4G mobile phone has a higher probability of success today than a voice call made on a 2G phone 5 years ago.

Answers to Consultation Questions

Question 3.1: Do you know of other CNI operators that will be affected by the withdrawal of VLB services that we have not considered above? If so, please provide details of these CNI operators, and, if possible, please outline their awareness and preparedness for the withdrawal.

By implication, all are included. However, the FCS will take due note of the implications of this point.

Question 3.2: Are there any other developments since the last BCMR or prospective developments that may be relevant to our review of this market? Please identify specific developments, explaining why they may be relevant.

As stated above, the operational needs of the providers of Critical Services may be changing. We further note that 5 years is a long time in this industry.

Question 4.1: Are there industry associations among the CNI community that you consider we need to contact to increase awareness of the withdrawal of these services?

We are unaware of other associations having general CNI interests.

Question 4.2: Do you know of any other category of CNI operator that will be affected by the withdrawal, but that would not become aware of it through our programme of engagement? If so, please provide details of the category of CNI operator and your view on how best to raise awareness with them.

No.

Question 5.1: Do you agree with our conclusion that the VLB TI retail market no longer satisfies the EC's three criteria test? If not, please explain your view.

No Comment.

Question 6.1: Do you know of any CNI operators that rely on retail VLB leased lines provided by KCOM? If so, please provide information about the CNI operator and contact information.

No.