



**AT&T Response to Ofcom's Consultation Document:**

***“New Voice Services – a Consultation and Interim  
Guidance”***

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## Summary

AT&T Global Network Services (UK) B.V. and AT&T Corp. (collectively "AT&T") are pleased to provide the following comments on Ofcom's consultation document, *New Voice Services, a Consultation and Interim Guidance*, issued on 6 September 2004 (the "*Consultation*"). In the *Consultation*, Ofcom uses the term 'new voice services' to describe public voice services that use Voice over Internet Protocol (VoIP) technology. The term is intended to cover Voice over Broadband services that allow consumers to make and receive calls over a broadband access connection, as well as 'next generation' networks and services in the longer term.

AT&T applauds Ofcom's vision in proposing a framework that will assist new voice and other IP-enabled services to bring unprecedented benefits to customers. AT&T believes that Ofcom is correct to base its regulatory approach to new voice services on a confidence that competitive market forces will deliver those benefits in a way that also protects consumer interests. AT&T therefore supports Ofcom's proposals to apply only those minimal aspects of regulation that are demonstrably essential to promote end user interests. Specifically, AT&T endorses Ofcom's key initial conclusions that:

- It is not desirable for all voice services to be required to offer the same features as traditional telephone services and [Ofcom] should instead enable consumers to make informed decisions.
- It is not desirable to rely on criteria such as the appearance of a service or whether it is used as a second line in order to draw a distinction between those services that are regulated in a similar way as traditional telephone services and those that are not.
- Not all voice services should be required to offer access to 999 but decisions about subscribing to such services must be informed.
- Because some new service 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.<sup>1</sup>

AT&T welcomes, in particular, Ofcom's leadership in implementing an interim policy to allow new voice services to offer access to 999 without having to meet all the obligations of Publicly Available Telephone Services (PATS). AT&T asserts that such a pragmatic and flexible regulatory approach is the best way of encouraging market entry and accelerating the availability of consumer benefits promised by IP technology. Specifically, AT&T agrees that the potential benefits of IP-enabled 999 services can be best achieved through a combination of market forces (i.e., differentiated service providers striving to satisfy customer demand for emergency service as a driver to

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<sup>1</sup> *Consultation* at ¶ 4.78.

switch from traditional voice service), industry-government collaboration on the optimal techniques to develop and fund IP-enabled emergency services, and precise customer notification of differences between the emergency service capabilities of a new voice provider and that of traditionally required capabilities.

AT&T also wishes to congratulate Ofcom on its forward-looking decision on numbering for new voice services as outlined in its Numbering Statement<sup>2</sup>, also issued on 6 September 2004. By adopting rules to ensure the availability of telephone numbers for VoIP services with minimal entry barriers, and, importantly, by determining that access to geographic numbers will be available to providers of all public voice services, not just Publicly Available Telephone Services (PATS), AT&T agrees that Ofcom has taken the appropriate steps to foster “*an environment where new voice services may flourish*”<sup>3</sup>.

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AT&T is pleased to provide the following answers to Ofcom’s specific questions.

**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?**

AT&T agrees that Ofcom has rightly identified the broad areas in which new voice services will differ from traditional voice services, namely: location and network independence, reliability<sup>4</sup>, new features and lower costs.

AT&T and others have already begun offering new IP-enabled voice services that provide both voice telephone functionality and enhanced functions far more advanced than the capabilities of traditional circuit-switched voice services. These features offer far more than high quality voice calls at very affordable rates. In addition to traditional “vertical features” such as voice mail, caller ID, call waiting and call forwarding, unique service attributes not possible with the PSTN are also readily available. Among these features that can be controlled and customised by the end user at a personal computer, are the ability to check voice mail from any phone or computer; the option of storing and forwarding “talking” emails containing voice mail messages; “do not disturb” functions that allow the user to set times to restrict incoming calls while also permitting an override for urgent incoming calls; personal conferencing; advanced call forwarding features that allow sequential or simultaneous forwarding to multiple alternative numbers; and other advanced

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<sup>2</sup> *Numbering Arrangements for New Voice Services*, Ofcom Statement, 6 September 2004.

<sup>3</sup> *Id.* at ¶ 4.55.

<sup>4</sup> With regard to reliability, AT&T agrees that for some services the reliability will be impacted by the performance of the user’s broadband connection. However, AT&T’s experience and that of our customers, is that VoIP call quality can already match or beat the best PSTN performance, especially where VoIP services use a lower compression technique than that used for TDM PSTN.

call management features such as personalised call logs, phone books, and click to dial functions.

These features and functions only scratch the surface of IP's potential. IP-enabled voice services are quickly becoming full-blown "computer" applications, limited only by the talents of applications developers. They offer the potential for the full integration of voice, data and advanced computer applications.

Developing applications and supporting network capabilities for business customers also is likely to be an important driver in the future development of IP-based services as a whole. Examples of such enterprise-generated applications include "one number" (or "follow me") services, instant messaging to any device at any location, interactive call centres, readily available multipoint videoconferencing and virtual meeting capabilities, real-time language translation and desktop multimedia services.

Equally important, these innovative service attributes are expanding rapidly. Because contemporary VoIP is a sophisticated computer application, new features can be added efficiently by software upgrade, rather than by upgrade to switching hardware. By orders of magnitude, this reduces the cost and time to bring service improvements from a concept in the labs, to the end user.

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

AT&T believes that the principal policy challenge is to find the right balance between encouraging providers of new voice services to enter the market with low entry barriers, and ensuring that consumers are properly informed and protected, primarily by market forces. Ofcom has correctly identified that there is a risk of stifling new innovative services that benefit consumers if the common "look and feel" call attributes of traditional and new voice services became the justification for applying identical regulation to both. Such a reactive approach would not acknowledge the advanced service attributes as well as the service limitations associated with use of VoIP technology. There are real differences, which will result mostly in consumer benefits and also some consumer challenges. Either way, these differences merit a flexible regulatory approach that is not tied reflexively to the regulation of circuit-switched voice services.

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

AT&T fully agrees with the following three initial top level aims identified by Ofcom, viz.:

- “ - *to help create an environment in which new technologies can be developed successfully in the market, so that consumers can benefit from a wider and more innovative range of services;*
- *to ensure that consumers are properly informed and protected in relation to the products they are using; and*
- *to limit the extent to which regulation creates distortions in the market.”<sup>5</sup>*

AT&T believes that a regulatory approach based around these objectives will stimulate the long-term potential for new voice services to deliver substantial consumer benefits through competitive market forces and consumer information.

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

While acknowledging that the focus of the *Consultation* is on consumer policy, AT&T believes that matters of economic regulation are also relevant because of their impact on consumers. As Michael Powell, FCC Chairman, asserted in a recent speech<sup>6</sup>: *“To realize the innovation dream that IP communications promises, however, we must ensure that that a willing provider can reach a willing consumer over the broadband connection. Ensuring that consumers can obtain and use the content, applications, and devices they choose is critical to unlocking the vast potential of the Internet.”* AT&T therefore believes that Ofcom will also need to consider regulatory safeguards that may be needed to ensure fair competition in the provision of IP -based voice services.

AT&T suggests that this activity needs to address scenarios where operators with Significant Market Power (SMP) might abuse their market power at the network layer to the detriment of competition in the applications layer, including for new voice services. Specifically, broadband access providers might seek to unreasonably impede access to the Internet content of other rival applications providers by blocking access to IP addresses, websites or platforms. They might also seek to engage in more subtle forms of discrimination, such as giving preferential access to their own applications, degrading access to rival applications or requiring their retail customers to purchase any IP-enabled or traditional service as a condition of obtaining broadband Internet access service, or improperly seeking to double-charge for broadband access (i.e., collect once from end user for broadband subscription, and then also seek an “interconnection payment” from VoIP providers when the end user accesses the VoIP service over that broadband connection). Therefore, in our comments on the European Commission’s recent VoIP consultation<sup>7</sup>, AT&T has suggested that, where such behaviours could be judged to jeopardise end-to-end connectivity, National Regulatory Authorities (NRAs) should also consider the case for using their powers under

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<sup>5</sup> *Consultation* at ¶ 4.14.

<sup>6</sup> Remarks of Michael K. Powell, Chairman, Federal Communications Commission at the Voice on the Net Conference, Boston, Massachusetts, 19 October 2004.

<sup>7</sup> *The Treatment of Voice over Internet Protocol (VoIP) under the EU Regulatory Framework – An Information and Consultation Document*, European Commission, 14 June 2004

Article 5 (1)(a) of the Access Directive (2002/19/EC), rather than Article 8, to apply appropriate remedies to all broadband access providers that control access to end-users and not just those designated as SMP<sup>8</sup>. AT&T recognises that EU NRAs have made limited use to date of their powers under Article 5, and AT&T would be interested to understand if Ofcom consider any other regulatory requirements could be invoked to address the concerns that we have outlined about the potential for anti-competitive behaviour.

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

AT&T believes that it is important that Ofcom's policy should clearly seek to preserve the ability of providers to offer voice services that do not meet the definition of PATS. This right flows directly from the European regulatory framework and Ofcom should be explicit that nothing in its policy development is intended to undermine the right of providers to provide voice services that meet the definition of public Electronic Communications Services but are not PATS, and that there is no suggestion in any of its policy proposals of extending additional obligations to such voice services.

**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?**

AT&T agrees that this is the correct approach.

Ofcom correctly recognises that requiring all voice services to offer the same standard features has the potential to restrict market entry, reduce competition, raise costs (disproportionately on smaller providers of niche services) and limit consumer choice. The unintended outcome of such an interventionist approach would therefore be to stifle innovation and to delay the consumer benefits of IP-enabled communications, including beneficial features that are impossible with circuit-switched voice.

AT&T also agrees with the corollary of not imposing a mandate for all voice services to provide the same features: consumers must be well informed about the services they are buying and how to use them, and should understand the differences between the capabilities of these services and the capabilities of a traditional voice service.

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<sup>8</sup> Recital 6 of the Access Directive specifically anticipates the use of Article 5 to guard against some of these behaviours by any network operator: " *they (NRAs) may ensure end-to-end connectivity by imposing proportionate obligations on undertakings that control access to end-users. (...) This would be the case for example if network operators were to restrict unreasonably end-user choice for access to Internet portals and services.*"

**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?**

AT&T agrees that a flexible approach to regulation, that focuses on encouraging service provider differentiation and customer notification, will best encourage innovation and investment in new voice services.

**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?**

AT&T agrees.

While some providers may choose to market their offer as a 'second line' service rather than as a primary line replacement, there is no way to control how customers will use the service. Ofcom rightly concludes that a consumer policy approach based on a regulatory distinction between primary and second line services would be difficult to implement and the appropriate policy approach is to focus on empowering consumers to make informed decisions about the products they are buying and how to use them.

AT&T urges Ofcom to focus not on rigid categories that fit nicely with traditional voice service facts, but rather to emphasise future-proof principles that allow a spectrum new voice services to evolve. By encouraging service provider differentiation combined with customer notification of capabilities, Ofcom will achieve this.

**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?**

As indicated in our answers to the earlier questions, AT&T does not accept that there is a justification for requiring new voice services to offer the same features as traditional voice services. From this perspective, the concept of a threshold (based on factors such as revenues or number of subscribers) for imposing such a requirement has no merit. Nor do we believe that implementing and policing such a threshold would be practical or equitable.

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

AT&T does expect that for new voice services targeting residential users, most service providers will have extremely strong incentives to continually improve emergency service capabilities, as such capabilities will be demanded by most residential consumers and high quality satisfaction of this demand will be a valued market differentiator.

Additionally, AT&T believes that there are new voice applications (e.g. those positioned as second rather than primary lines for business teleworkers) and

users where provision of access to emergency services may not be appropriate or, indeed, a particular customer requirement or business priority. Furthermore, AT&T asserts that the right to provide voice services without 999 access flows from the EU regulatory framework and cannot be over-riden by national regulators. In these circumstances, AT&T believes that it would not only be disproportionate but legally impossible to impose a blanket requirement on all providers to provide 999 access.

**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?**

AT&T agrees.

**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?**

AT&T agrees.

Mechanical application of traditional requirements – requirements that were developed for circuit-switched based networks – to IP-based applications, risks stunting development of new and important services, features and functionalities that could actually improve consumer interests. AT&T therefore endorses Ofcom's proposal that not all voice services should be required to offer access to 999 and further agrees that voice providers should give precise information to customers on how the supplier deals with access to 999, and how that solution differs from traditional emergency access capabilities.

**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?**

AT&T agrees and further asserts that this should be viewed as a trade-off between banning market entry and competition from new voice services until an emergency service goal imposed by the regulator is satisfied by a small number of operators (and then, mostly with a traditional voice pedigree), as opposed to allowing immediate market entry by a broad array of service providers who will compete on many fronts, including the development of IP-enabled emergency services that exceed the capabilities available today from traditional voice providers.

In most respects, new voice services will offer consumers capabilities that far exceed those of traditional telephone services. Of course, there are certain current limitations to be addressed and improved. With regard to emergency

services, there is wide recognition of the fact that new technologies and operational arrangements will need to be developed and perfected, because IP-enabled services often can't comply strictly with legacy requirements that were designed over time to suit traditional circuit-switched telephone service capabilities. However, these current limitations should be viewed as an opportunity rather than a risk, given that IP environment applications could develop far superior public safety solutions for the 21<sup>st</sup> Century. This potential – and market entry itself - could be compromised if unrealistic obligations are imposed at the outset. Rather, industry should be encouraged to develop workable, operational solutions with regard to routing emergency calls, the effective transmission of caller ID and provision of location information.

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

AT&T believes Ofcom has accurately described the broad costs and incentives associated with PATS provision. In particular, AT&T agrees that there is likely to be an incentive for providers of primary line replacement services to offer the full range of PATS features. These market-based incentives include not only the availability of number portability, but also the expectations and demands of customers considering migrating from traditional services to a new voice service.

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

AT&T agrees with Ofcom's understanding and welcomes Ofcom's recognition that significant unintended disincentives could arise from the definition of PATS. For example, AT&T believes that a company may be strongly dissuaded from offering access to the emergency services if this determines the service to be a PATS and attracts, in a non-discriminating manner, several additional and immediate obligations that may be incompatible with the specific service.

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

AT&T agrees with Ofcom and the European Commission on the advantages from a policy perspective of the "alternative approach", i.e., allowing providers to choose whether or not they are providing PATS, even where they provide all four elements, including access to emergency organisations, contained in the PATS definition.

AT&T also concurs with Ofcom's view that the legal basis for such a regulatory approach is unclear. As legal certainty is fundamental for investment decisions, we agree with Ofcom on the need for greater clarity from the European Commission on the legal implications for regulators and providers.

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

AT&T believes that the three policy initiatives identified by Ofcom (i.e., interim PATS policy and consultations on network integrity requirements and consumer policy framework) represent the appropriate priorities. As outlined in our answer to Question 4, AT&T believes that Ofcom also needs to start considering, in conjunction with other EU regulators, the issue of competitive safeguards in the network layer in the context of IP-enabled voice services.

**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.**

AT&T commends Ofcom on its interim policy. Ofcom has recognised that a strict legal interpretation of the PATS definition is inconsistent with its objective to foster pro-consumer new voice services. AT&T believes that Ofcom has struck the appropriate balance by combining a more flexible approach for the short term with a long-term plan to study market performance, during which Ofcom will be able to confirm whether intense competition combined with informed consumer choice is indeed delivering the desired outcomes.

**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?**

AT&T agrees that it is reasonable to have different network integrity requirements for nomadic services compared to services at a fixed location. AT&T also agrees with Ofcom and the European Commission that VoIP services that provide 'nomadic' access to the public telephone network do not constitute provision of 'PATS at a fixed location'. Ofcom asserts that consumers may be less aware of the limitations of nomadic new voice services in this regard compared to those of mobile services. AT&T however believes that the regulatory treatment of mobile PATS services is still relevant from a policy perspective in that it would be equally disproportionate to impose network integrity obligations on new voice services, given the similar technical limitations.

AT&T agrees that subscribers to PATS services at fixed locations need to be informed that any network availability and integrity commitments apply only if there is a contractually agreed location for the provision of the service and the service is being used at that location. AT&T believes that this information should be included in the customer information provided at point of purchase (see also our answer to Question 27 below).

**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**

AT&T agrees with Ofcom's proposal to adopt the third option as the most flexible and pragmatic way of addressing the network integrity issue against the background of rapid technological evolution, and uncertainties about the design and capabilities of Next Generation Networks.

**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?**

AT&T believes that the network integrity obligations arising from Condition 3 of the General Conditions of Entitlement should apply only to those PATS providers that have direct control over or ownership of the underlying physical transport infrastructure. While it may be possible for providers without such direct control to conclude agreements on quality and reliability with the network provider, this may not be practical in many circumstances, especially if the provider is unwilling to negotiate. Ofcom should not base its policy approach on the assumption that such arrangements will be possible and should certainly not contemplate any regulatory obligation on service providers. However, as AT&T suggested in our response to the European Commission's VoIP consultation<sup>9</sup>, Ofcom's approach should make clear that, where providers do have control over or ownership of the underlying physical transport infrastructure, their network integrity obligations would be breached if they took any deliberate action to undermine the quality or performance of rival PATS providers using the same transport infrastructure.

**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?**

Where the network provider is not providing any PATS services (and the network integrity obligations of Condition 3 are invoked only by virtue of another provider providing PATS over the network), AT&T believes that, in line with our answer to Question 21, the network provider's regulatory obligations should cover not taking any deliberate action to undermine the quality or performance of PATS providers using the network. Beyond that, AT&T agrees with Ofcom that it should be up to the PATS providers to take the initiative on negotiating any agreements with non-affiliated network providers on reliability.

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<sup>9</sup> *The Treatment of Voice over Internet Protocol (VoIP) under the EU Regulatory Framework – An Information and Consultation Document*, European Commission, 14 June 2004

**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?**

AT&T agrees.

Line powering is an inherent capability of the technology used for analogue and ISDN2 services. This is not the case for services using current IP technology. AT&T therefore agrees with Ofcom's conclusion that the appropriate emphasis should be for providers of these services to inform their customers of the service capabilities and any limitations. AT&T welcomes Ofcom's intention not to impose blanket line powering obligations on all providers. With respect to power-source limitations on the service availability for Telephone Adaptor devices, AT&T believes that industry innovation and customer demand will continue to drive improvements in quality and reliability.

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

AT&T asserts that it would be disproportionate at this stage of market development to impose an obligation on providers of nomadic PATS services to ensure caller location information is available to emergency organisations. AT&T agrees with Ofcom that, as IP technology develops, many options may emerge to automatically identify user location, and that industry and government should continue to work closely in voluntary cooperation on this issue.

**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?**

For now, the interests of consumers are best served by encouraging market players to develop longer term, workable, operational solutions with regard to provision of location information. Meanwhile, providers of services with access to 999 should obtain agreed location information from their customers when service is initially provided and inform their customers that moving their terminals from the agreed fixed location – without providing advance notice of the official address change to ensure a verified update of location registries -- will result in loss of guaranteed 999 access.

**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)?**

AT&T agrees that the need for appropriate consumer information, particularly with regard to 999 access, may be more important where services look and feel like a traditional telephone service. However, we encourage Ofcom to assert a more fluid principle that encourages service provider differentiation, accompanied by clear customer notification of the limitations and capabilities

of that service. This approach allows a spectrum of innovation, without having regulation unnecessarily constrain this development.

Thus, as we indicated in our answer to Question 7, “look and feel” should not determine the formal regulation applicable to a service, but should be a factor in deciding on appropriate content of consumer information. Even where services are clearly different (e.g. PC based services), providers should still give their customers clear and appropriate information regarding the features and limitations of the service.

**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?**

AT&T agrees that this is the right approach. However, the effectiveness of communication methods may vary according to the customer segment. For example, the best techniques for informing users of a service provided to teleworkers of a large corporate customer may differ from those appropriate to a service targeted at a mass consumer market. AT&T therefore recommends that Ofcom should not be overly prescriptive in specifying the approach to be adopted.

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

AT&T agrees with Ofcom’s initial conclusion that formal regulation regarding provision of consumer information is not the best way forward. AT&T would prefer an approach based on self-regulatory guidelines or code of practice but we acknowledge Ofcom’s concerns about the likelihood of industry reaching consensus on such guidance in view of the increasing number and diversity of players providing these new services. In these circumstances, AT&T agrees that a co-regulatory solution along the lines proposed represents a pragmatic way forward. As we discussed in our answer to Question 27, the most effective techniques for communicating information may vary according to customer segment and any co-regulatory guidelines will need to reflect this.

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AT&T commends Ofcom for its visionary leadership in articulating a balanced approach to the regulation of IP-enabled new voice services that recognises both the potential for these services to deliver consumer benefits and the necessary departures from past regulatory practice to ensure these benefits become a reality. Together with its numbering decision, Ofcom’s consumer policy proposals for new voice services and interim PATS policy will provide

an excellent framework for stimulating investment, innovation and competitive market entry in the UK, while ensuring consumer and public safety interests are appropriately protected.

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