

## Consultation response form

Please complete this form in full and return via email to [ipmigration@ofcom.org.uk](mailto:ipmigration@ofcom.org.uk) or by post to:

IP Migration Team  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	<b>Proposed Guidance on protecting access to emergency organisations when there is a power cut at the customer's premises: Proposals for guidance on General Condition A3.2(b)</b>
<b>Full name</b>	[X]
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	BUUK
<b>Email address</b>	[X]
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)</b>	Nothing
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

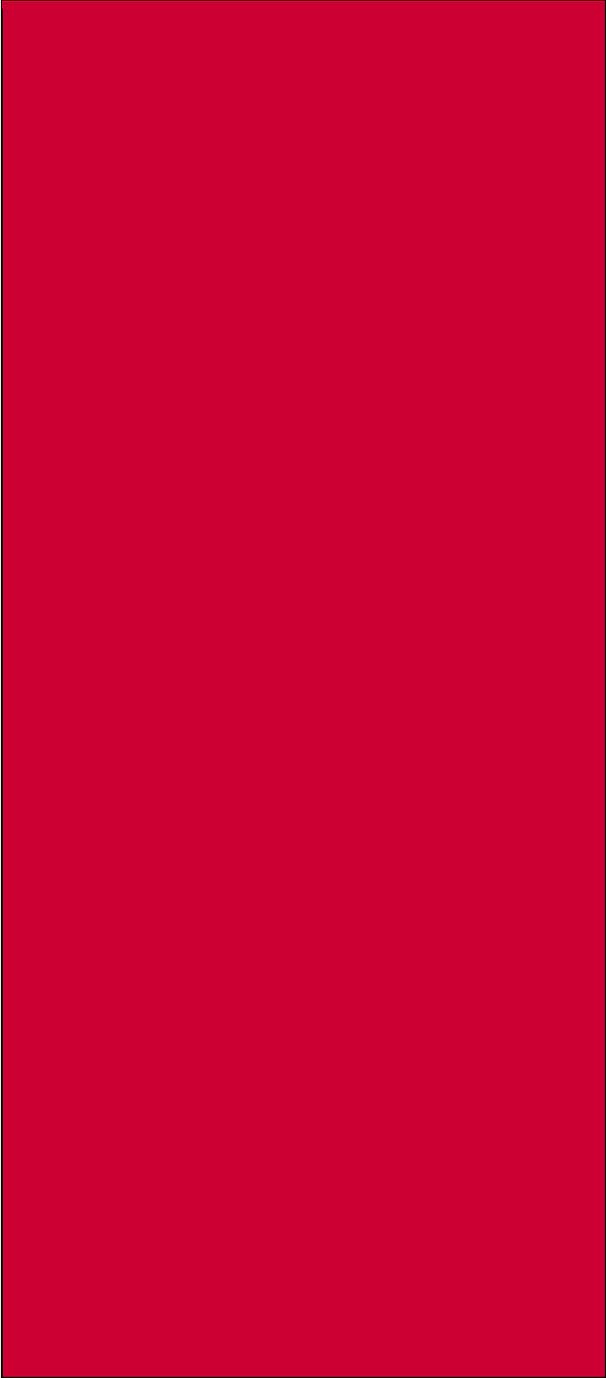
<b>Do you agree with the four proposed principles? If not, please give reasons. Please set out your comments on each of the principles separately.</b>	<p>BUUK owns both a fibre infrastructure provider (IFNL) and a fibre only retail service provider business, seethelight. This response is a consolidated response on behalf of both of these companies.</p> <p>We welcome Ofcom's consultation into the proposed guidance on protecting access to emergency organisations when there is a power cut at the customers premises. Currently IFNL install a battery backup unit in each home to continue to power the Optical Network Termination unit which provides voice</p>
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connectivity, in the event of a power cut. This ensures that customers can continue to utilise their wired phone during power cuts to make calls to all parties including the emergency services.

We believe that the new four guiding principles provide a sensible balance that will enable industry to reduce overall costs whilst ensuring that those customers who are at-risk and/or vulnerable receive a better more targeted service. We welcome the additional guidance contained within the consultation and will continue to work with Ofcom to implement it. We would welcome a further meeting with Ofcom to discuss our proposed solution.

We have the following more detailed comments:

- We believe that the new guidance will primarily impact on retail service providers as they own the interface with the end customers.
- The consultation specifies that the principals jointly apply to both the Public Electronic Communications Network (PECN) i.e. infrastructure provider (INGNL/IFNL) and the Publicly Available Telephone Service (PATS) provider i.e. the retail service provider.
- The consultation makes clear that protecting access to emergency organisations should be free of charge to those categorised as being at risk, however it doesn't make it clear if the cost should be borne by the infrastructure provider or retail service provider. If the costs are to be borne entirely by the infrastructure provider and not onward charged to the retailer, then there will be no incentive on the retailer to optimise the costs of their service. It is therefore likely that an enhanced availability service may become a default free service for all customers as an infrastructure provider would not have access to the necessary information to



challenge whether a customer was at risk or not. This would increase the overall costs of providing the service unnecessarily. We suggest that the costs should be passed on from the Infrastructure provider to the service provider as either a one off cost, or as an ongoing rental cost.

- Power Network companies already provide additional services to vulnerable customers in the event of an interruption to supply. We recognise that it would be sensible to work with these companies to provide a more integrated service where appropriate.
- Should the emergency response numbers that are covered by the guidance be extended to the new national power interruption number – 105?

Confidential? – N