Your response

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Confidential? – No
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With over 10 years' experience of collecting speed test data from UK Internet Customers, Speedchecker would like to offer some comments on Ofcom's Broadband Universal Service Obligation.
We endorse the approach taken by Ofcom and, in particular, the decision to consider bids from all providers rather than to accept the offer from BT. This is no criticism of BT but rather an understanding that the geographical and technical requirements of the obligation are unlikely to be successfully met by one provider in a timely manner.
There are 5 areas that we would offer comments on:

> 1: Provision for emergency calls in the event of power cuts
> 2: Timescales for implementation to premises
> 3: Downtime and maintenance
> 4: Expected speed on installation and how to manage future changes to the minimum speed
> 5: How to ensure the £3400 threshold continues to be appropriate

1: Provision for emergency calls in the event of power cuts
It would be expected that any provision will made in accordance with Ofcom's recent guidance: https://www.ofcom.org.uk/__data/assets/pdf_file/0018/114219/consultation-access-emergency-power-cut.pdf. However, particular care should be taken that remote users are made aware that any VOIP provision will not work in the event of a power cut. It may be assumed that the customer already has suitable provision either via landline or mobile but they should be made aware that this will need to be maintained after provision of VOIP.
If they currently have no provision for emergency calls then the steps set out in the Ofcom guidance should be followed.

2: Timescales for implementation to premises
It is understood from the Obligation that customers have a right to request a connection but that there is no guarantee that they will be entitled to one. However, there is no indication of timescales with regards to their application. We would like to see some clear guidance on:

- How long before a customer can expect a response
- How long after a successful application can they expect the service to be installed. We understand that this will depend on the work involved but there could be some sample use cases that will help.
- How to appeal a decision
- How soon after a refusal can they ask again

3: Downtime and maintenance
Provision of Internet services in remote areas can be difficult and more likely to suffer extended downtime in the event of failure. We would like to see some guidelines about expected service levels particularly if they will be lower than for services that fall outside of this obligation.

4: Expected speed on installation and how to manage future changes to the minimum speed
The obligation includes a 10 Mbps target for customers. It would be good to have some guidance on this so that the customers know if this is a minimum requirement or an aspiration. The customer should also be advised about how to use speed test tools such as [Broadband Speedchecker](#) to verify their speeds.
Also, we would like to see a process by which this will be increased as technology and requirements continue to increase.

5: How to ensure the £3400 threshold continues to be appropriate
It is not for us to comment on whether £3400 is the correct threshold but we would like to see a process for this to be reviewed as the costs of technology change.