ITSPA Response to Consultation: Emerging technologies and their potential impact on the communications industry

About ITSPA

The Internet Telephony Services Providers' Association ("ITSPA") represents over 100 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

A full list of ITSPA members can be found at http://www.itspa.org.uk/.

Introduction

We appreciate the opportunity to respond to the Ofcom review of emerging technologies and their potential impact on the communications industry.

ITSPA members, by nature of them being early adopters of VoIP protocols, are familiar with breaking ground with new technology and disrupting this industry in the past and therefore our membership consists of a hot bed of ideas and future innovations.

It is the experience of many members that the current Covid-19 crisis has hastened migration to IP services and consolidated the use of the many 'over the top' solutions that have become a lifeline during this period. So whilst the services we discuss here could not be considered emerging in the sense that they've existed for some time, we feel it necessary to highlight that the ongoing development and improvements in this area continue at an exceptional rate and failure to keep up with suitable regulatory interventions (or removal of, as appropriate) or failure to encourage investment will result in longer term harm for consumers and service providers alike.

Supporting migration to IP solutions

From a consumer perspective the need for fast, affordable broadband is already well understood and programmes are well underway to address this need. The country has an increasingly strong reliance on a number of internet-based solutions and this has deepened further still as we have introduced additional capabilities for home schooling, home working, online GP support and so on.

The culture shift recently forced upon many will no doubt remain with us to some extent and therefore the broadband requirement underpinning this must remain at the top of our agenda. With access to the internet being considered as essential as other utilities by many, the needs for similar levels of governance and regulation that are afforded to gas, electricity and water must be considered.

The communications supply chain

For this industry to thrive and continue to invest in emerging technologies it is important that complex supply chain and areas of risk are understood.

For some time now ITSPA have urged Ofcom to give more consideration of matters from a business provider standpoint. This is something we frequently feel is missing from decisions and which is reflected in the, often detrimental, outcomes for wholesale providers and service providers focussed on business consumers.

Whilst everyone would agree that consumer protections are vital both from a legal and moral view point, where the unique requirements of business consumers and their supply chain are not taking into consideration there is a real risk of damaging the very service providers who exist to offer competition and innovation in this sector.

Examples of this can be seen in matters such as the future of switching and portability. Where the greatest pain is felt by business customers, and much of the cost absorbed by service providers, there is very little focus with all work prioritised in the residential space.

A large number of services are currently provided through a reseller model with sometimes multiple levels of reseller in the chain, only when this unique eco-system is considered and protected will the environment be truly safe for investment and innovation.

Over the top services

Throughout the Covid-19 crisis period we have seen dramatic uptake in services such as MS Teams, Zoom, Google Hangouts and similar. Whilst this was an inevitable trend, it has no doubt been expedited by the recent situation and now that more users have realised the benefits of these services we anticipate there will be relatively low return to traditional voice services.

With this in mind we have to turn our focus to these types of products which have traditionally evaded many telecoms regulations by identifying themselves as a data service only. Historically some of these, particularly the larger, OTT providers have outsourced the telephony elements of their service to evade scrutiny and regulatory obligations.

It is our opinion that it is essential to ensure there is no competitive advantage created by side-stepping regulatory oversight.

Industry Standards

As touched upon earlier our response to this call for inputs is to re-iterate that, whilst VoIP is not an emerging technology, it is a technology that is still maturing and is being used in different ways as services and availability evolve.

The NICC has a number of current workstreams that aim to produce a set of UK standards to ensure smooth interoperability, acceptable security standards and compliance with Ofcom regulations. They are also looking at improvements in emergency location data and numbering porting and management using blockchain technology.

Internet Telephony Services Providers' Association

Each of these workstreams come together to help VoIP mature and settle alongside other OTT products and services which will form the basis of many more innovations in the future. Therefore, it is the view of ITSPA that we must ensure sufficient resource and encouragement is available to see this work to a conclusion.