
FCS Response to Ofcom's proposed Plan of Work 2022/23

Introduction

The Federation of Communication Services represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

FCS response

Question	Your response
<p data-bbox="188 439 756 472">Do you have any comments on our proposals?</p>	<p data-bbox="794 439 1002 472">Confidential? – N</p> <p data-bbox="794 510 991 544">Generic points -</p> <p data-bbox="794 551 1358 768">FCS remains concerned that this latest Ofcom plan of work is too highly consumer focused (consumer coverage, consumer protection, consumer harm, consumer switching) and does not cover the key UK business market enough.</p> <p data-bbox="794 775 1337 992">While business is mentioned, especially getting everyone connected, sufficient Ofcom focus needs to be allocated to the business market to ensure the success of this key area which will stimulate the UKs economic recovery and future growth.</p> <p data-bbox="794 1043 1374 1406">FCS seeks to engage with Ofcom to discuss the industry governance solution and entity in order for all stakeholders to deliver the industry One Touch Switch solution and related industry projects such as Number porting, CDB and messaging. FCS views this as a fundamental work item that requires extensive Ofcom engagement to deliver a coordinated, functional operational industry solution.</p>
	<p data-bbox="794 1435 1374 1995">One Touch Switch - Under fairness to customers, FCS has serious concerns in this area. While accepting that residential volumes, residential choice and the ability to switch are key drivers for One Touch Switch, the day one April 23 requirements need to include singleton business switching functionality. FCS understands that multiple line/service business switches will generally be managed on a project basis but business switching needs to be included in governance and design initial thinking, to the benefit of our members and UK plc. Additionally, the future IP relationship with fixed and mobile will require the ability to</p>

	<p>move/switch fixed and mobile, therefore Number Porting should be incorporated in initial thinking. Openreach does not differentiate between FTTP/SoGEA res/bus orders and therefore the business constituency needs to be fully engaged in the governance to ensure the design is not simply residential focussed. FCS remain concerned that the OTS timeline is potentially too challenging.</p>
	<p>Migration to voice over IP - As industry moves towards All-IP and the PSTN switch-off, FCS is concerned that the 'product supplier - various wholesale suppliers - retailer - reseller' model and dependencies will evolve and could potentially disadvantage our members. The resellers and smaller retailers, instead of buying products and services directly from Openreach (for example) will in future buy voice service from wholesalers who will be able to choose what functionality and for example pricing deal offers, they pass on to the small retailers/resellers. FCS believes it will benefit the industry if Ofcom monitors this issue and enforces appropriate prohibitions on anti-competitive agreements and potential abuse of dominant positions, ensuring that smaller retailers/resellers are not disadvantaged when compared with for example the larger retailers of vertically integrated companies. FCS suggests that Ofcom consider a media campaign to help consumers and businesses to be more aware of the PSTN switch-off and the opportunities of moving to All-IP. FCS remain concerned that the PSTN closure and move to All-IP timeline is potentially too challenging.</p>
	<p>Mobile convergence - with the evolution of some larger vertically integrated suppliers owning both mobile and fixed networks and offering converged solutions, FCS feels that there will be the potential for these large supplier retail arms to hold an advantage when compared with the medium/smaller retailers and resellers. FCS encourages</p>

	<p>Ofcom oversight of this area and the market structures to ensure that there is equality of access and appropriate regulation going forward.</p>
	<p>Number Porting, CDB - FCS believes that while there is still much debate to progress, the Centralised Data Base is a fundamental building block towards controlling numbers and in future 'building trust in numbers' (i.e. by negating spoofing). Number Porting will be required where a Voice application is moved suppliers and the customer wishes to retail their number. FCS champion wholesale competition and for our members to have the ability to move wholesaler, change technology or potentially move portfolio.</p>
	<p>Net neutrality - FCS has previously responded to the initial Ofcom consultation for this area and is happy to hold ongoing discussions with Ofcom going forward. Our main thrust is that Mobile (4/5G) and fixed are converging using IP technology and therefore should be considered as a whole and not siloed. FCS has previously responded to the initial Ofcom consultation for this area and is happy to hold ongoing discussions with Ofcom going forward.</p>
	<p>Telecoms security framework - FCS is generally supportive of increased/improved Telecom security and the proposed new framework. High on our concerns is the increased costs our members could potentially incur and how responsibilities are to be apportioned. FCS believes obligation/regulation should be targeted on infrastructure parties and for OTT services on the supplier/provider themselves (i.e. Teams would be Microsoft). FCS also believe there must be a clear framework which is extensively communicated and publicised and there must also be sufficient notice and time allocated for all identified stakeholders/parties to implement the changes/solutions required to meet these obligations.</p>

	<p>FCS is pleased that the key areas of Wireless Innovation, Spectrum demand for utilities, Climate change policy impacts, On-line services to access spectrum, Sustainability & Climate Change (Networks & services fit for the long term) are included and covered in this years Ofcom work plan.</p>
	<p>Cyber security - FCS believe that the responsibility to ensure online safety should be targeted at the party that has the control and the technical ability to support the industry requirements (generally ISP network providers).</p>