



20 February 2013

BT'S RESPONSE TO OFCOM'S Consultation

“Emergency call handling agent performance”



Introduction and summary of views

1. BT both as a Communications Provider (CP) and a Call Handling Agent (CHA), supports Ofcom introducing non- statutory guidelines that will aim to help CPs meet their obligation to deliver calls to the emergency services under GC4.
2. Emphasising the roles and responsibilities of CPs and what they should expect from a CHA when contracting with them is a positive move.
3. We support that CPs need to understand what is expected of their CHA and agree there should be recommended performance standards. However we do not think it would be reasonable to expect a CHA to report on its performance to a CP on an individual basis or to agree separate contract terms with each CP. To do so would be onerous and very costly. We believe including suitable wording in a standard contract that acknowledges the CHA will work within the guidelines should be sufficient to assure the CP. Publishing overall performance would allow a CP to assess performance for its own end users.
4. The proposed guidelines only refer to measures for CHAs. To make sure end users' calls reach the emergency authorities, there are four components to the process - the CP serving the end user, the CHA, the Emergency Authority (EA) and the network operators for the EA and CHA. The CHA is one link in the chain (as noted by Ofcom) but to be able to achieve all the proposed performance measures they will rely on the others.
5. As part of the guidelines we need Ofcom to define the boundaries between the different components. For example an EA's network provider can influence the ability of the CHA to put a call through to the EA and the time taken for this e.g. due to network failure, congestion or overload. Another example is the way calls are forwarded through public networks to the CHA, e.g. the number of network routes available and how any rerouting and automated retry attempts are made for emergency calls. We propose guidelines are also recommended for CPs providing network facilities to the end user and to EAs.
6. We would like the guidelines to acknowledge that whilst every effort is made by the CHA to meet the proposed measures, there will be times when a CHA will not be able to meet them through no fault of their own. These could range from CPs providing incorrect location data to the CHA, to resourcing issues due to unexpected high volumes of calls queuing into the EAs due to exceptional circumstances - such as the Buncefield fire, or more recently the flooding in the northeast of England. BT would expect to see the CHAs performance disregarded for periods when any party, other than the CHA is failing to deliver their part of the end-to-end service.
7. Ofcom rightly highlights some situations where the CHA cannot be expected to maintain availability, even when business continuity measures are deployed. We need Ofcom to clarify that certain periods should be excluded from the calculations so exceptional events do not distort the performance figures and achievement of acceptable performance. A similar approach is taken in the rail industry where train operating companies report train punctuality but only after periods are removed when exceptional incidents outside their control have occurred. Such exceptional incidents for 999 purposes could include when the CHA has to deploy EA "buddying" procedures, or when EA answer times (perhaps measured as periods when secondary and tertiary connect-to numbers are necessary) are outside given parameters, or



when the number of incoming call levels exceeds forecast by more than 10% (limits of normally expected daily variations)

8. Ofcom recommends a CHA provides each CP with performance reports. Our view is this is not practical and attempts to do so will be burdensome and result in significantly increased costs. To minimise additional costs we need Ofcom to acknowledge this in the guidelines and recommend it is up to the CHA how they demonstrate performance. For example publishing a set of service performance measures across the totality of its customer base, or by call type (e.g. for all fixed lines, all mobile callers, or all VoIP users) via a central website. CPs can then check the CHA performance.

9. Ofcom also recommends CPs use the guidelines when contracting with a CHA. As mentioned above our view is that liaising with CPs on an individual basis will be impractical, especially if bespoke clauses are requested due to a CP's own interpretation. We ask that clarity is given and that it should be up to the CHA how they discharge the guidelines in their contracts in a practical way. For example we are considering how to include a general clause in our standard interconnect agreement that will apply for all CPs.

10. Whilst we appreciate a CP would want reassurance from their CHA that business processes/practices, risk and business continuity assessments are in place we do not see this as being something that needs to be shared with a CP in detail. In fact some of the details that would need to be discussed are best not shared widely as these are recognised as key components in the UK's Critical National Infrastructure. To provide confidence to CPs we recommend the CHA carries out a regular (e.g. annual) audit. BT Regulatory Compliance and Internal Audit sit within BT Group and have an independent and impartial role to provide assurance to industry, the BT Group and the Board as to the adequacy, governance and internal controls throughout BT. This is achieved through the delivery of a risk based plan of reviews / audits and the production of key performance indicators. The review outcome would be available to CPs as part of the CHA's reporting. This will provide added assurance and confidence to the CP of the CHA's commitment to the guidelines and to playing their part in making sure a CP can meet their regulatory obligations.

11. Not all CPs contract directly with a CHA to perform the handling of emergency calls. In BT's case as a CHA, the contract to provide a CHA function is between us and the operator of the network with which we interconnect and over which we have calls delivered to us. We do not have contracts with any CPs who resell that network operator's capacity. The guidelines need to make it clear that the CP, who has GC4 responsibilities, makes sure that if they haven't got a contract directly with a CHA, that a suitable chain of contracts exist and will provide the guarantees the guidelines require to the CP.

12. The guidelines only address part of the CHA's service that deals with voice call transmission: they do not address issues around the location data needed to support the handling of that call. As mentioned in paragraph 6 the CHA could meet the requirements set out in these guidelines but still fail completely to provide the service the caller requires if the CP has not provided complete and accurate name and location information. We welcome Ofcom's intention to consult separately on this and would urge this happens as soon as possible.

13. In the event of Ofcom publishing guidelines, we would like to see an implementation period of 6 months. This would provide the CHA time to make sure any additional data requirements are available.



BT's answers to the questions in the consultation

Question 1: Do you agree that expectations regarding CHA performance could and should be published?

Answer: Yes. BT, both as a CP and a CHA, is supportive of Ofcom publishing non- statutory guidelines that will help CPs meet their obligation to deliver calls to the emergency services under GC4.

Question 2: Do you agree with the scope of this Consultation as set out in Section 4?

Answer. Not entirely.

The proposed guidelines cannot be considered in isolation to guidelines for other organisations involved in the handling an emergency call. The CHA's performance is greatly influenced by the performance of the Emergency Authorities and by other CPs involved in handling an emergency call i.e. the originating network, the network that delivers the EAs calls and any transit networks involved in the call. The CHA relies on these organisations meeting their responsibilities, e.g. EAs answering in a timely manner and CPs networks providing resilient and prioritised routing, in order for the CHA to fully meet the required performance set out in the proposed guidelines. In particular, we note the Service Availability measure rightly allows for "Force Majeure" (matters beyond reasonable control of the CHA); the Call Waiting Time measure should also include the same provision.

Question 3: Do you agree with the guidelines as set out in Section 5? Are there any other performance standards or metrics that you think should be added?

Answer: Not entirely.

In addition to our paragraphs 5, 6,7,8,9 and 11 we have also commented on the specific wording of the proposed guidelines below.

Our general view is it will be impractical and a disproportionate burden for a CHA to:

- Review the guidelines
- Provide individual performance measures
- Contract individually
- Discuss the detail of the CHA organisation and operational management
- And provide details of any audits

with every CP.

We propose the guidelines recommend the CP can accept a standard contract clause (in BT's case this would be a clause in the standard interconnect agreement - schedule 225) that states

- The CHA's commitment to meeting the required guidelines
- Performance measures will be published for generic call types, i.e. fixed lines, mobile calls and VoIP calls
- The outcome of internal compliance review and audits will be published



- The CHA's commitment to meeting the requirements in the Government's PECS Code of Practice

We see this as being an efficient and helpful way for a CP to satisfy themselves a CHA is committed to meeting the guidelines and to decide if they can meet their GC4 obligation.

Specific comments:

Para 5.3. First bullet should become "the security and robustness of the CHA's own call centres and associated systems"

Para 5.4. The PCA 5 of 95% paragraph should be further clarified to refer to: "..... 95% of calls made to 999 or 112 that are received into the CHA's call queues will be answered within 5 seconds, as measured over a 24 hour period. Any calls abandoned without answer within 5 seconds need not be included though should be noted."

Para 5.6. We think automated queuing messages are useful and should be used to help manage in situations of extreme stress within a CHA's call handling systems, as they are by the emergency services.

Para's 5.2 – 5.14, and 5.22. We do not think it would be realistic or appropriate for a CHA to review these arrangements in detail with each CP for the reasons stated above.

Para 5.15 – 5.18. We believe these can be omitted from the detailed guidelines as they concern working arrangements between the CHA and the EAs covered in detail within the Government's PECS Code of Practice. A reference to CPs gaining confirmation that the CHA follows the PECS Code of Practice should be sufficient. Para 5.19. We would value discussing the exact nature of the quarterly report to Ofcom. As already mentioned, we propose providing separate monthly figures for Calls Answered relating to fixed line calls, mobile calls and VoIP calls along with corresponding PCA 5 figures. There would be the ability to provide daily figures where needed. We would need to better understand requirements on "Calls Received" (Calls Answered + Calls Abandoned?) and Handling Time.

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