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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Non

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Comments:

Question 1: How do you envisage the model of competition changing over the next 3-5 years, and what sort of input products will be needed to support this competition?:

The network changes over the next 3-5 years will bring in newer services for customers. That said, the consumer will need protection from changes that will have a negative impact on the current services they are receiving.

The BSIA believes that the current structure of liaison is flawed as there is no industry (CPE) forum for discussion on the NGN/NGA changes. NICC is the NGN forum and OFCOM is the regulator. To ensure that the changes to the network are fully understood and occur with the minimum disruption to customers it is recommended that OFCOM form an industry (CPE) forum. This industry forum would have a fuller understanding of proposed impacts on consumers and support both OFCOM and the NICC with common standardization issues.

Question 2: Do you agree with our analysis of the requirement for xMPF?:

No Comment

Question 3: What additional technical standardisation work is required to support NGN deployment?:

The NICC standards are currently only guidance documents for NGN's to follow. If standardization is to take place then the NICC standards need to be implemented, as a legislative requirement for all NGN's to comply with. There should also be standards for terminal adaptors and termination points.

Question 4: What policy positions do you believe Ofcom ought to adopt in relation to interconnection between IP and TDM networks?:

A mixture of IP and TDM networks has been shown (in security equipment) to create the longest round trip delays. This means that there will be a higher risk of CPE failure than in just one type of network. OFCOM should adopt the policy of ensuring there is full interoperability between all NGN's and that NGN/NGA will have no effect on current or older equipment moving from TDM to IP networks.

Question 5: Do you have any comments on our analysis of investment uncertainty in relation to BT's 21CN plan?:

The BSIA agree with OFCOM analyses. But OFCOM needs to understand that this short term planning by BT (12-18 months) will cause major problems for manufacturers of CPE who have to design, manufacture and test equipment on the NGN. With an ever changing NGN environment and short term planning requirements it is very difficult for CPE manufacturers to invest for the future.

Question 6: How do you think Ofcom should take forward considerations relating to switching involving next generation access and core networks, and which areas should we focus on?:

BSIA's experience over the past few years is that it is only BT that have engaged with the CPE manufacturers to define what effect their new network has on current CPE. BT has also been very open in their migration plans (or changes to them).

This is not the case with any other NGNs. BSIA believes that with the exception of BT all other NGNs are not taking the consumer protection issues seriously. This is something OFCOM needs to address.

Question 7: Do you agree that the consumer protection principles and our approach to addressing consumer protection issues are still valid?:

This is still valid and two of the consumer protection issues need to be foremost in this decision, namely that the services offered should be at least equivalent to their existing services and consumers should not suffer any detriment during transition to NGN's. Currently some NGN's do not support current alarm systems (data over voice carrier) and therefore fail both of the consumer protection issues stated above.

To overcome this problem OFCOM should ensure that all NGN's (not just BT) focus on CPE compatibility. Common standards are required for 'gateways' between NGN's to ensure interoperability. OFCOM should ensure that more information is supplied to customers when the changes are made to the networks.

Question 8: Do you agree with our assessment of how the alarm equipment incompatibility problem should be addressed?:

The BSIA agrees with the OFCOM assessment. The industry needs to understand all NGN specifications and migration activity and it is proposed that an industry CPE group is formed to liaise with OFCOM and the NICC.

Question 9: What will be the impact on vulnerable consumers of replacing telecare and other alarm equipment?:

There will be a number of impacts on vulnerable consumers from the cost of replacing equipment; the possibility of their system not being able to signal which could invalidate their insurance and the liability issues with systems that may or may not work on different NGN's. Due to the lack of engagement with all but one of the NGN's it is also unknown how the proposed replacement equipment will operate on the various other NGNs.

Question 10: Would it be appropriate to agree a common set of terminal equipment compatibility tests? What would be the most appropriate forum to develop these tests?:

The BSIA has produced a test plan and has been using this to test equipment against a test facility supplied from BT. There is a requirement for a common test centre funded by all NGN's so that all CPE manufacturers can test their equipment against all NGNs. There is also a requirement for a common test specification like the BSIA test specification for each type of network (PSTN, ISTN, 21CN, Fibre, etc) and network gateways.

Question 11: What other steps could be taken to help manufacturers ensure terminal equipment is compatible with the QoS parameters of NGNs?:

The network termination points need to be understood so that a standard for terminal equipment can be written.

The CPE manufacturers need to have access to a common NGN test facility in which CPE manufacturers can test their equipment against all NGN providers to ensure compatibility.

Current BSIA utilises a BT test facility to test (PSTN test plan) against 21CN. For the future the BSIA is looking at an ISDN test plan and a Fibre test plan. But to ensure compatibility there needs to be an industry/NGN forum to get a common understanding of the issues that need to be overcome.

Question 12: Do you have any other comments about compatibility of terminal equipment with NGNs and how they should be addressed?:

The main impact the NGN's will have is on current and legacy CPE. From the BSIA point of view this point is not understood by all but one of the NGN's. This has a major impact on consumer protection issues and needs to be fully discussed and solutions found before any major migration occurs otherwise the consumer will suffer.

Question 13: Do you think there is risk of terminal equipment incompatibility that warrants further SIP UNI standardisation? How should this be progressed?:

There should be standardization for terminal adaptors at an agreed level to ensure that the common services are dealt with. This does not stop manufacturers adding extra functionality, but will ensure that all terminal adaptors will work on all NGN/NGA.

Question 14: Do you have any other comments about compatibility of terminal equipment with NGNs and how they should be addressed?:

See answer to question 13 above.

Question 15: Will a slower transition from TDM to NGN networks pose a risk to voice quality of service? How should such risks be addressed?:

Alarm systems operate on voice side of the network and the slower transition from a TDM to NGN network will make the equipment more susceptible to roundtrip delay issues and failures.

Question 16: Do you have any comments on the long-term trends in the evolution of networks to next-generation architectures?:

The BSIA believes that well defined common standards for NGN,s and full interoperability between NGN are vital to ensure CPE compatibility with NGN,s. Consumer protection issues

should be the main focus of any change to the network as this will bring all the relevant stakeholder together to ensure that all incompatibility issues are dealt with prior to migration.