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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?:

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?:

Regulation to ensure fair competition will be difficult over this period as the networks and products evolve giving advantages to different players varying over time. However overall during this transition period it appears that BT could have an advantage over other CPs. There is a need for products that will reduce the inequalities between BT and others though these products may be difficult to define and create. There appears to be a linkage between this question and questions 4 and 5 and there may be links to other questions.

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

We agree with the analysis and we consider that there is little justification for this product.

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

We agree with the proposals detailed in paragraph 3.92. Additionally there may be a requirement for further interconnection and interface standards though currently this need is not fully clarified.

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

The policy adopted should be based on encouraging investment in the NGN while at the same time avoiding distorting the market or unnecessarily increasing the costs of any operator. There is a need for further study in order to identify any alternative solutions and determine the most appropriate policy to adopt.

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

We recognise the benefit of commercial agreements as a means of resolving issues but in this case we consider that regulatory action may be required to remove some of the current uncertainty though it is difficult to identify any appropriate action. Additionally we consider that it may be appropriate to investigate if there are any other alternative solutions for removing the current uncertainty such as CPs reducing their dependency on BT.

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?:

Current procedures are based on consumer satisfaction with the switching process but there is nothing relating to consumer satisfaction with the new supplier or if the reasons for switching are being achieved and we consider that these factors should be monitored. There is a need to ensure that the process is as simple as possible which appears inconsistent with the bundling process now being used. There is also a need to determine how much the consumer should be

aware of the network technology used, e.g. TDM or IP, and how these different technologies will affect them and also the relationship with the Internet.

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

We consider that generally these are still valid. However we consider that with the increase in bundling and increased complexity of the services, applications and content market there may be a requirement for increased monitoring by Ofcom to ensure consumers are adequately protected.

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

Generally we are in agreement with the proposals. However we consider that it is important to ensure that measures are in place to prevent telecare alarm users being left without a fully functioning service.

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

In some cases the telecare equipment is provided on a contract rental basis so this may reduce the direct financial impact on consumers. However there is still a need to keep the increased costs to a minimum to avoid financial difficulties.

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?:

We consider that there would be significant benefits in developing a common set of compatibility tests. We consider that it would be appropriate for NICC to develop these tests though we wonder if there would be benefits of having an independent entity, such as BSI, involved in the process. There may also be an international dimension to this work.

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

With the possibility of both IP and TDM networks in use and differing arrangements for interconnecting between the networks we consider that a database is required containing details of the range of parameters that may be encountered and the interactions between these parameters and the differing equipment types. The database could almost be in the form of an interactive model for providing simulations of how different types of equipment would work together. This interactive model might include details of the terminal equipment compatibility tests to ensure that the interworking of different equipment meets the requirements. This database should be regularly updated to reflect network developments.

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

We consider that our responses to the two questions above adequately cover our views.

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

To some extent this depends on how extensively the incompatible equipment is used and how significant the difficulties will be. Additionally for the IP PBX we consider that there might be difficulties in using UK standards or regulations to limit the options allowed by international standards. We consider that the first step in addressing this issue to clarify how significant the problem is and if it is really significant then take appropriate action.

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

We have no further comments.

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?:

We consider that there is a risk of reduced voice quality of service and we consider that a combination of regulatory and commercial action should be used to reduce some of the risk but we do not consider this to be a complete solution. It appears that there is a link between this question and questions 4 and 5 as all appear to be addressing a common theme. The actions related to resolving the investment uncertainty and the policy adopted for the interconnection between IP and TDM networks may reduce this risk to voice quality or give a better understanding of the situation.

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

In view of the current uncertainties in the development of the NGN it is difficult to comment on this section. However we consider that further research is required to understand how the trends will evolve and the drivers involved as we consider that some of the trends might evolve very differently to that predicted by Ofcom. There also seems to be a number of possible different business models and there is a need to consider how these models relate to the evolution of network architecture and the various trends. There may also be a need to examine the relationship between NGN and the Internet to determine the real role of each and this could have significant implications. However despite these uncertainties we consider that there would be benefits in a complete separation of conveyance and network intelligence.