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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:**

Yes

**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?:**

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

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

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

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

**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?:**

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

The ENA agrees that consumer protection principles are still valid. ENA members welcome the fact that Ofcom recognises the risk to consumers and that transition to NGN should not result in any detriment to customers' services. The ENA has long stated that the migration of services to NGN platforms would be a challenging process and so it has proved to be. Ofcom's approach to resolving consumer issues, 'with most of the issues being addressed by CPs without formal intervention by Ofcom', may well have served the situation thus far, particularly where the major focus was centred on BT's NGN programme. As clearly stated within the consultation, the next stages of NGN are to say the least complex, with the need to integrate NGNs with existing TDM networks. The fact that this consultation is now needed indicates that Ofcom's approach may need to be more active to minimise potential risks to customers, particularly where those services are critical to national infrastructure. The ENA however welcomes Ofcom's statement at 4.71, indicating its intention to continue to monitor the situation in respect of critical services. As yet Energy Companies have been unable to secure services compliant with the ENA specification TS 48-6-7 for use with protection systems and the significant changes to NGN strategy outlined within the consultation further places the delivery of such at risk.

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

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

**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?:**

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

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

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

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

Whilst much of the focus of the Electricity Industry has been in respect of compliance of services in regard to protection systems, the impact of delay on telemetry applications has not yet been addressed. Many telemetry applications may well have been tested under dial-up conditions but typically this would not be the methodology deployed by Electricity Companies. Many will use 2mb/s (megastream) and sub 2mb/s (kilostream) services to support communication to substations and as such these may not yet have been tested. Delay variations may well result in failure of telemetry systems. Where the end-to-end delay parameters can be manipulated it may well be that these variations can be overcome, however if these parameters are fixed, it may well be that telemetry systems will fail. Integration of NGNs with existing TDM networks may add to such a risk and will need to be a key part of any testing programme going forward. Given BT's change in strategy, development and testing becomes even more critical should services need to migrate to new platforms. ENA members have actively engaged with necessary testing programmes and would welcome the opportunity to further engage in any discussions required regarding the testing programme going forward.

**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?:**

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