

Title:

Mr

Forename:

Paul

Surname:

Mitchell

Representing:

Self

Organisation (if applicable):

Email:

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:

It is disappointing that the jargon in this consultation inevitably restricts it to people familiar with the telcomms industry, and the consequent heavily weighted bias to commercial interest groups rather than consumers.

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?:

no comment

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

Too much focus on commercial opportunities and insufficient attention to the overall public good from this investment. Telecomms is both a commercial service and a general public necessity.

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

no comment

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

no comment

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

As a dominant provider BT has a duty to the industry as a whole to provide certainty of strategy to enable third party investment decisions.

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?:

no comment

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

The apparent approach now being mooted appears to have been influenced by providers who see a commercial advantage to delaying NGN developments, rather than investing in up-to-date technologies. A significant volume of telecare equipment in the community is not fit for purpose and should be reviewed and replaced as part of an integrated analysis of consumers' needs. Delay is merely extending the life of this obsolete and undesirable equipment to the detriment of those with defined needs which are not being properly met.

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

This intention to proceed at the pace of those with most to gain by delaying the introduction of NGNs plays into their hands at the expense of greater safety risks to consumers from unfit alarm equipment. This industry lacks an objective minimum quality standard. Ofcom potentially occupies the most advantageously independent position, but has so far not shown sufficient independence of mind from the special commercial interest groups. The NGN requirement should determine the compatibility of alarm and telecare equipment, not the reverse.

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

It will force care organisations to review the sufficiency of equipment in place. It also ought to force equipment suppliers to change their business models to ensure that all equipment they supply is always fit for purpose (ie meets objective performance standards) and keeps up to date with infrastructure changes.

Vulnerable customers will be better protected by this wholesale review of a much misunderstood area and a re-assessment of their needs and their present equipment. Some users are unknowingly at risk already from out-of-date, technically deficient equipment. This should be identified and removed in the interests of the consumers' welfare and safety.

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?:

Only a forum which is independent of sponsorship or undue influence from equipment suppliers would be fit to set performance and compatibility standards. No such forum currently exists.

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

Universally adopted equipment performance specification standards. Independent accreditation of equipment and services, in the public interest. Rationalisation of roles currently being played by default by industry associations, pressure groups, and quasi-governmental groups such as PASA/OGC.

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

None

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

No comment.

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

No comment

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?:

No comment

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

No comment.