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TELECOMMUNICATION ASSOCIATION OF THE UK WATER INDUSTRY - TAUWI -

RESPONSE TO THE
OFCOM CONSULTATION
On
Next Generation Networks
Responding to recent developments to protect consumers, promote effective competition and secure efficient investment

INTRODUCTION

This response is provided by Atkins Ltd on behalf of the **T**elecommunications **A**ssociation of the **U**K **W**ater **I**ndustry **(TAUWI)**

Atkins Ltd act as the main point of contact for TAUWI members and represent their interests on a range of matters, including responding to strategic consultation documents on behalf of its members.

This response may be reviewed by each of the 26 member organisations that form TAUWI and therefore negates the need for submissions from individual water companies. However some members may choose to provide individual responses.

The Association was formed in April 2004 and replaces the Telecommunications Advisory Committee (TAC) which for the previous 14 years had acted as the focus for the UK Water Industry in relation to fixed and mobile communications and scanning telemetry from a technical and regulatory aspect. The scope of TAUWI has been extended to capitalise on new opportunities resulting from emerging technologies and regulatory changes. At the same time, more emphasis is being placed on strategic issues in relation to other sectors of an organisation's operation, such as IT Systems, General Communications Infrastructure and business requirements.

Membership of TAUWI is drawn from representatives from the following Industry Groups:

10 Water Service Companies
11 Water Supply Companies
Scottish Water
Environment Agency
Northern Ireland Water

Jersey Public Services Department
Land Drainage Boards

TAUWI is chaired by Mr Richard Luke of Anglian Water Ltd.

The Water Industry is a major user of Telemetry Systems and employs various communications technologies, including UHF Scanning Telemetry, GSM, GPRS, Leased Line and PSTN to support their mission critical operation. All aspects of water management, including the recovery, treatment and distribution of water, the control and monitoring of water quality and operation of flood defence systems utilise Telemetry to ensure compliance with statutory requirements as well as reducing maintenance and operational costs.

General Comments

The Water Industry welcomes the opportunity to respond to Ofcom's Next Generation Networks consultation document.

PSTN technology is used by the vast majority of industry members to provide connection and transport of data between telemetry outstations or field devices and member's central sites or telemetry "Master Stations". As such, Water Industry members have spent considerable time and resources conducting system compatibility tests at BT's testing centres at Adastral Park and Swansea, to determine whether their Telemetry equipment is likely to function correctly following migration to 21CN. Tests have highlighted issues with some member's equipment and BT is working to resolve these prior to inviting members back to re-test their equipment. For its part, TAUWI has acted as a focal point for the industry and regularly engages with members, BT and CPs via regular conference calls and focus group meetings to ensure 21CN migration issues and risks are identified, collated and communicated effectively. This facilitates the resolution and mitigation of any problems where incompatibility is confirmed.

The recent change of BT's implementation of its 21CN move away from the planned migration of voice customers to 21CN and concentrate investment on next generation access (NGA) networks raises a number of issues for the Water Industry. One of the key issues is the uncertainty that this introduces to the planning for future investment in Telemetry and associated data system upgrade or replacement. BT's decision to adopt a much shorter planning horizon of 12 – 18 months is at odds with the Water Industry standard 5 year investment planning period, making it difficult for the industry to react to any future changes in BT's network architecture that may impact on existing services. And whilst BT's decision to migrate to 21CN voice at a slower rate than previously planned will help in providing time to complete CPE compatibility testing and mitigation, it is not clear whether upgrades to the access network via FTTC and FTTP will not result in further CPE compatibility testing.

Responses

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 Water Industry understands that the model of competition will change dependant on the final shape of the BT 21CN network. As such, the Water Industry views therefore that agreed interoperability standards are put in place at an early date as possible.

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

The Water Industry would agree with your analysis but we would wish Ofcom to scrutinise this to ensure no undue price increases are forced upon the industry.

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

The Water Industry is fully aware and supports the interoperability work carried out by NICC in this regard.

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

It is considered that this issue is best dealt with by CPs.

Question 5: Do you agree with our analysis of investment uncertainty in relation to BT's 21CN plan?

Yes, we agree with your analysis and are concerned this uncertainty will affect the Water Industries ability to accurately plan its capital investment of over the next 5 years for the upgrade and replacement of Telemetry and associated data systems.

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

Yes, the three principles established in the NGN 2006 statement ensure protection of consumers prior to, during and after the transition process to 21CN. The Water Industry's experience thus far with this process is that CPs' are working to address issues raised by members, keeping members informed and minimising disruption to services.

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

Yes, The Water Industry has identified risks to other business systems, including security / intruder alarm systems and agrees that the organisations responsible for the supply and maintenance of these systems are best positioned to advise customers of the need to adjust or replace equipment. We also agree that CPs should take steps to ensure the alarm community, via the relevant industry associations, are kept informed of any changes to interface specifications or other network changes that may impact the future operation of these systems.

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?

Yes, an agreed common set of NGN CPE compatibility tests would ensure consistent results across CPs, reducing any perceived risk for industry members who may decide to migrate across onto another CP's NGN platform.

The NICC develops interoperability standards for public communications networks and services in the UK and would be best placed 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?

To ensure terminal equipment meets the QOS requirements of NGNs, it is essential that a common set of protocol and interoperability standards are defined, agreed and implemented.

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

It is essential that any ongoing developments by CPs involving the introduction of alternative NGN equipment, software releases or similar design changes that may alter the characteristics / functionality of connection are recorded and thoroughly tested to ensure continuing compatibility with previously tested CPE.
It is envisaged that the Water Industry will need to carry out this regression testing at CPs test facilities.
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Question 16: Do you have any comments on the long-term trends in the evolution of networks to next generation architectures?

As Ofcom will appreciate, the Water Industry engages with a large number of different CPs therefore the issue of interoperability standards is of prime importance to ensure the industry is not in any way disadvantaged. TAUWI would greatly appreciate visibility of any work Ofcom are undertaking in this area.

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