

Ericsson's response to the Ofcom consultation on 'Next Generation New Build'

Introduction

Ericsson welcomes the opportunity to comment on Ofcom's "Next Generation New Build" consultation.

In general Ericsson supports the principle of encouraging competition at the deepest practical levels of the network. However, it would be inappropriate for regulation to artificially support the retention of older technologies beyond the point at which they would have naturally been retired by the market. Ericsson agrees with the Ofcom view that it would be disproportionate to impose a requirement to build out metallic access in situations where new build access is being provided by fibre technology, provided that adequate steps are taken to ensure that the advantages of a competitive market for services are maintained.

Responses to specific questions

Question 1: What can Ofcom do to encourage timely standards development for new build NGA wholesale access products and interfaces? Which industry body is best placed to undertake the standardisation of these products and interfaces? What action should Ofcom take if these standards fail to materialise?

The industry would benefit from a set of internationally agreed standards for products and interfaces. In particular, interoperability standards are important as there is likely to be a patchwork of different technologies underlying next generation access deployment as technological evolution continues. It is also important that the interoperability standards are kept as simple and transparent as possible. However, long delays should not result from the introduction of such standards. Ofcom should as a matter of urgency call for organisations to come forward to undertake this work. Should this not happen quickly then Ofcom could undertake this work under contract. It is essential that any such standards are recognised at least at a European level and preferably globally.

Question 2: Do you agree with Ofcom's approach to promoting competition and consumer choice in new build fibre access deployments?

Ericsson agrees with the approach of supporting competition and giving consumer choice.

Question 3: Do you
(a) believe that the existing obligations must be met by replicating the existing copper products, or that an alternative approach could be satisfactory? What are the implications of replicating existing products on fibre?

Ericsson agrees with the Ofcom's view that it would not be proportionate to require copper networks to be built out in addition to fibre. However this does require careful attention to the wholesale product offerings. Also there needs to be sufficient attention given to the development of new products and services to replace those currently requiring a metallic connection. Relevant international standards and experience of other countries should be carefully considered.

(b): agree that SMP holders rolling out fibre do not need to roll out a copper network in parallel solely to meet their LLU obligation?

Agreed.

(c): agree with Ofcom's approach in relation to WBA and new build areas?

Agreed.

(d): believe that the WLR obligation must be met by replicating the existing copper product, or that an alternative approach based on an ALA type product would be satisfactory?

Ericsson believes that an ALA type product approach should be able to meet the requirements

(e): believe that the CPS obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?

Ericsson believes that an ALA type product approach should be able to meet the requirements

(f): believe that the IA obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?

Ericsson believes that an ALA type product approach should be able to meet the requirements

(g): agree with our proposal to interpret GC 3.1 (c) as being met through the provision and use of a battery backup facility to maintain uninterrupted access to emergency services in new build developments?

Ericsson believes that a battery backup facility to maintain uninterrupted access is the correct solution. However steps may need to be taken to ensure that there is adequate consumer awareness of the need to maintain batteries.

Question 4: Do you think access to the duct network, including non telecoms duct, is a potentially feasible means of promoting competition in new build? If so what types of commercial and operational models could successfully support such access arrangements in the UK?

All opportunities should be explored to ensure the quickest and most cost effective solutions are employed for next generation access deployment, both for new build and for overlay, to this end duct sharing may be a useful technique.

John Newbold
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