

Response from: Alan Cox
Responding on behalf of: Self

There are two concerns I have with the proposal as it stands. The first is that users are used to the idea that 999 works on any telephone. In an emergency situation having to play guess the telephone will get people killed. This becomes an even bigger concern in businesses because some of the time the 999 call is made by a visitor. It also matters for disabled users who may not be able to see the colour of a telephone or read a notice explaining it lacks 999 capability.

I believe it is necessary either by voluntary code or regulatory rules to require 999 works from all conventional telephone devices. The voluntary code would work well as it would defacto become a consideration in the case of negligence cases.

This does not mean that all lines should have 999 service, merely that the exchange functionality is smart enough to route 999 calls to the lines which do. A business buying 30 lines does not need to make 30 999 calls at once.

The second area of concern is internet telephony. I don't believe Ofcom has as yet grasped the future in this area. While providers like to imagine a world of interconnected VoIP and POTS phone networking systems the reality is likely to be that services like Skype, "talk to me" web browser plugins and peer to peer technology will shape telephony and reduce phone companies to bandwidth provision for such services. In addition it seems reasonable to expect the takeup of such services to be driven by regulation of existing services. OFCOM essentially has no ability to regulate a world where there is no telephone company yet Ofcom will not be able to entirely ignore it.

While it may seem odd to some telephone people that you can create a network with no phone company, it is already happening (eg Skype) and the problems such as numbering are already solved without central authority on the internet.

Alan