

**Response from:** Dr Jeremy Hodge  
**Responding on behalf of:** Self

I have spotted your consultation on consumer protection requirements for new VoIP-type telephony systems.

You correctly raise the issue of access to 999 calls. I do not think it wise to permit non-999-enabled VoIP services for residential applications. There are also similar arguments against allowing their use in other (e.g., business, recreation, retail) sectors.

You assume that consumers will always have a choice in which telephony services they buy.

Increasingly we are seeing private and social housing developments / residential accommodation being built and operated which offers a full range of services including the building itself, heating, domestic appliances, security services, cable / satellite TV, telephony, ISP etc. The management companies running these can include local authorities, health service, housing associations, PFI consortia, etc. The management company-provided telephony service would be the primary and only service available. In some cases end consumers (residents) may be prevented or deterred from installing additional or alternative services. It should not be allowed for management companies to provide residents with a non-999-enabled service for residential applications - but this provision may be outside the scope of Ofcom's jurisdiction - ODPM etc. may need to become involved.

The primary customer for such a VoIP service would be the management company for the development, not the end consumer. If you do permit non-999-enabled, or reduced reliability VoIP 999 systems, then the end consumer (resident) must be told, before they commit to their lease / contract, and the service should not be permitted to be withdrawn.

If you would like further info please call.

You should also contact the fire brigades (CFOA) on this issue.

***Dr Jeremy Hodge***