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Dear Sirs

We are grateful for the opportunity to respond on behalf of Eversheds to Ofcom's Consultation regarding New Voice Services ("the Consultation")

Ofcom's Consultation entitled "Strategic Review of Telecoms" addresses the fact that the "Universal Service Obligations", currently provided by the traditional voice services, in turn must evolve and adapt to changes in the market. Market development has led to an influx of new services available to the consumer which must be regulated in the same manner.

Whilst we consider the Consultation rightly discusses the difficulty involved in requiring new voice service providers to provide 999 access (due to the very nature of certain new voice services) we believe that until a full review has been made as to how the Universal Service Obligations are to evolve, debating in isolation whether 999 access should be offered by new voice services is hazardous. Other obligations such as offering low tariffs to the consumer will ultimately have to be transferred to the new voice service providers in order to encourage competition amongst this market.

Universal service obligations as a *whole* need to be reviewed in light of the changing market. More and more consumers have a primary fixed line as well as a secondary line, normally through mobile telecommunications. Wider issues need to be considered in light of this and the impact which the current shift to mobile communication has on the obligations currently imposed on fixed line operators.

The balance sought by Ofcom between consumer protection and regulation and the need to allow technology to advance would be more easily achieved if all issues currently surrounding new voice services were considered at the same time.

Yours sincerely

Graeme Gordon & Alex Hempsey



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