

New voice services - a consultation and interim guidance

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: New voice services - a consultation and interim guidance

To (Ofcom contact): Justin Moore

Name of respondent: Peter Barwich

Representing (self or organisation/s): Self

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Name/contact details/
job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes

No

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and all intellectual property rights in the response vest with Ofcom. If I have sent my response by email, Ofcom can disregard any standard email text about not disclosing email contents and attachments.

Ofcom can publish my response: on receipt

once the consultation ends

Name Peter Barwich

Signed (if hard copy)

New voice services - a consultation and interim guidance

Should new phone services offer the same features as traditional phones?

Clearly 'No'. This would restrict development completely. New 'phone' services could offer almost anything. One thinks of SMS, multi-media messages, video only, links to other VoIP phones only, etc, etc. Apart from that to say that a new service must be the same as the traditional one is like saying that all cars on motorways should be preceded by a man carrying a red flag. The world has moved on, let the market decide what it wants, when, where, and for how much money.

Because of the strong public interest in access to 999, should we make all voice services offer access to 999, even for services that do not offer all the other features that traditional voice services do now?

Clearly 'No'. This question has essentially been answered for around 20 years. A high proportion of PABX (internal exchanges) offer only digital lines to individual extensions and many of these do not function in the event of a power cut. 999 service is NOT available from any phone on any desk now, so why should this requirement be pushed onto new VoIP providers? In addition VoIP itself is already in use in many companies, often without the end users even being explicitly aware, and often does not provide emergency service. This particular genie has been out of the bottle for many years; you cannot and should not, try to put it back.

Some new voice services may not be able to offer the same reliability for emergency calls as traditional phone services. Which would be better - a service that doesn't allow emergency calls at all or a service that does, but which may be less reliable?

Some access is clearly better than none, but, and this is an important but, VoIP providers should have to give informative and accurate estimates of reliability which are statistically verifiable. This requirement should also apply to landline providers. Nothing is perfect, not even landlines, and consumers should have information available.

General Comment

I am a little surprised that this consultation is taking place now. I have experimented with VoIP services since 1998; even at that time there were commercial service providers available. I have used VoIP exclusively for international calls for nearly a year now, as has the company I work for. There are numerous hardware solutions available making connections to such services easy, and there are numerous software solutions allowing ones computer to be used as a phone. There is a proposal to have a new prefix for such 'lines'. Why? I currently have a lo-call UK number, but also had the choice of a US number or an Israeli number. There are many other choices available. Why should I have to broadcast to the world the connection type I use?