



Internet Telephony Services Providers' Association

ITSPA response to the Government's Digital Communications Infrastructure Strategy Consultation

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) is the UK Voice over IP (VoIP) industry's trade body, representing over 80 UK businesses involved with the supply of next generation voice communications services to other communications companies, businesses and residential customers both within the UK and abroad. ITSPA pays close attention to the development of VoIP regulatory frameworks on a worldwide basis in order to ensure that the UK's next generation voice telecommunications industry is as competitive as it can be within international markets.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Summary

Given the broad and wide-ranging nature of the Government's Digital Communications Infrastructure Strategy Consultation Document, ITSPA has decided that it would be most appropriate to respond to the parts of the consultation which are of most relevance to the VoIP industry. Most of the points below have been made in response to Question 36 of the Consultation (which is directed at the VoIP industry specifically):

Would there be benefits to investment from a focus on broadband only services? Are there any barriers to the emergence and adoption of broadband only services, whilst still providing necessary access to emergency services?

Export and Renumber

Gamma Telecom Holdings Limited (an ITSPA corporate member), with the support of other Communications Providers (including other ITSPA members), submitted a Statement of Requirements to British Telecommunications plc's ("BT's") Openreach division last year, which was accepted this year, to implement service and systems improvements to ensure that ancillary services to the physical line (e.g. broadband) were not interrupted when the Subscriber to the number on the line transferred their voice



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service. This has yet to be implemented by BT, but is a substantial requirement for the industry in the promotion of switching (by removing negative consequences) and therefore competition.

Naked DSL

Aside from the issues with emergency calls which are dealt with below, Naked Digital Subscriber Lines (or "wires-only broadband"), keeping aside fibre only deployments such as Virgin Media's offering, is simply the provision of a line as it stands today, with most of the same costs, but without the inclusion of a tie cable between the distribution frame in the BT exchange and the associated line card / port in the voice switch in the same exchange. A variant of this would be naked fibre to the cabinet where the metallic path between the street furniture and the exchange, which would only be used for voice, is no longer required either.

This would have the effect of reducing line rentals by a degree depending on the economic model used to assess these costs and any common costs associated with it, but there would be a reduction in all cases. This is especially relevant in the business sector where broadband is increasingly used for data or voice over data services without the traditional metallic path being used for voice at all. ITSPA members would advocate that these types of products would be popular, are accessible in other countries and would aid the development of new services.

We note that some 16% of higher income households and 25% of lower income households are currently mobile only. We would therefore suggest, given the augmented location information available from mobile phones as it stands today, that "going overboard" on fail safes and redundancies for emergency calls on fixed lines may be disproportionate. However, we would make the following points:

- 1) ITSPA would question whether General Condition 4 of Entitlement should apply to data only services
- 2) VoIP services on Naked DSL MUST carry an opt in health warning about Calls to Emergency services
- 3) ITSPA is not aware of any Femtocell (including EE & Vodafone) or DECT phone that have integral battery backup.



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4) Virtually all of the population now have mobile phone services. If they want access to a VoIP application, all they need is a clear health warning on the VoIP phone system about its ability to access emergency calls.

5) ITSPA would remind the Government that access to 999 services on the traditional PSTN also has potential issues around connectivity. For example if there are problems at the exchange or the metallic path between the premises and the exchange (power failures or technical problems) then access is affected anyway.

General Comment

Additionally, ITSPA notes that the current Communications Act contains a provision to exclude businesses with 10 employees or fewer for special regulatory protection.

This means that a telecoms boutique law firm would get these protections but a pub landlord employing 15 part time students would not. It is unclear whether a company with 11 employees at the point of contract is covered if it later has a Dispute with a telecommunications company after making 2 redundant. These, and numerous other examples, merely serve to demonstrate how impractical this domestic addition to an extensive EU framework is and we would urge that it is reviewed at the earliest opportunity.