

Statement of Strategic Priorities for telecommunications, the management of radio spectrum and postal services

Consultation response from:

- **Technology-Enabled Care Services Association (TSA)**

Consultation questions

1. Do you agree with the Government's strategic priorities and desired policy outcomes for telecommunications, the management of radio spectrum and postal services? *See responses by Section.*
2. Does this document set out clearly the role of Ofcom in contributing to the Government's strategic priorities and desired outcomes?
See responses by Section.

Section 1: World-class digital infrastructure

Section 13

The Government's Future Telecoms Infrastructure Review (FTIR) sets an ambition for switchover that enables consumer migration to full fibre services. However, access to IP-connectivity, and fibre in particular, will likely be hampered by current proposals to restrict access for vulnerable consumers who employ social alarm systems (up to 2 million people across UK). This relates to concerns for the continued operation of alarm systems, given an anticipated impact on voiceband alarm data exchange, and the expected loss of 24hour alarm connectivity in the event of power outages in the home environment. Communications providers are currently proposing that vulnerable user requests for new IP-telecoms connectivity should be intercepted, and such users put 'to the back of the queue' pending later stages of forced migration to 'ALL IP', thereby allowing more time for alarm providers and CPs to find a better solution.

The Technology-Enabled Care industry (including social alarm services) is oriented towards personal needs and delivery of care services, and it has limited access to deep technology skills. Furthermore, the remote monitoring of care inevitably depends upon interconnectivity of multiple communications providers (from consumer to remote service provider). We therefore anticipate that the TEC sector will impact and slow the migration plans, unless dedicated assistance is prioritised.

Section 23

The proposals from communications providers to intercept and delay vulnerable user access to IP-telecoms connectivity is contrary to the Universal Service Obligation. Such proposals will also have the effect that social alarm systems and other technology-enabled care systems be observed as obstacles to fair access to modern communications services.

We recommend that priority should be given to the need for Comms Providers, coordinated by Ofcom, to work closely with the TEC sector to deliver solutions for alarm connectivity that maintain the Universal Service Obligation for vulnerable users.

Section 27

It is anticipated that 'voice-only IP services' will prove attractive to many vulnerable users. However, the systems and consumer equipment are not yet defined, and are expected to provide further challenges to the compatibility with remotely monitored alarm services. We recommend that UK Government should encourage Ofcom and CPs to work closely with the TEC sector, to ensure reliable solutions are defined for vulnerable users, before market launch of voice-only products.

Section 31

The experience of other countries in switching networks to IP is that 'over the top', life-critical applications may need to migrate to different forms of connectivity. In

Sweden for example, the move to IP alarm systems has resulted in 95%+ of systems switching from landlines to cellular/SIM connectivity. This will create significant changes for the UK Technology Enabled Care sector, and where assistance and guidance on the use and reliability of mobile networks will be essential. Roaming will for example play a key role in assuring reliability of connection. The UK Government should give priority to support and guidance to the TEC industry, to help understand the logical architectures, infrastructure and methods for re-constructing reliable and high-availability services.

Section 33

It is anticipated that 5G will become a key element of future TEC systems. It is therefore essential that UK Government establish follow-on plans and funding support to encourage wider 5G adoption after the Testbeds and Trials Programme. It is also recommended that further use cases for 5G should include the use of 'Internet of Things' application to remotely supported care and health.

Section 36

Telecommunications coverage will be critical to the success of remotely-managed care services in rural locations. Many vulnerable users will also require good in-building coverage, including that for assisted housing settings. It is recommended that priority is given to this area, to encourage continued innovation in care and health applications.

Section 2: Furthering the interests of telecoms Consumers

Section 46

It is our view that 'vulnerable' users can often become isolated in our communities, and it is they who could derive the greatest benefits from full IP connectivity. Therefore, whilst the concerns for reliable alarm operation are understood, the concepts of planning for delayed access to IP networks will work against the interests of vulnerable users (see comments on Section 23), and in this sense will constitute harmful industry practice.

We therefore recommend that priority is given to the encouragement of high-availability and digitally-connectivity for services which deliver life-critical services.

Section 47

The criticism of communication service providers in relation to consumer engagement is likely to be exacerbated by the planned migration of vulnerable users and alarm system services to IP-connectivity. Therefore, it is recommended that Ofcom engagement with the technology-enabled care sector is prioritised, with sufficient support and funding to target good quality engagement with 'vulnerable' service users.

Section 53

The migration to IP is already restricting access to the best broadband deals for some consumers. This relates to the fact that some Communications Providers are shifting the responsibility for ongoing reliability of remotely connected alarms to the consumer. Unless consumers are in receipt of support and guidance, they will be actively discouraged from pursuing best deal options.

It is recommended that priority is given to fair access to broadband services, particularly for vulnerable and alarm service users. The TEC sector should be supported to deliver guidance and signposting to consumers in relation to broadband options and the impact of alarm service constraints.

Section 59

We fully support the prioritisation of minimum standards for Communications Providers in delivering services and support to consumers with needs that include mental health, cognitive impairments, dementia and related care needs.

Section 3: Secure and resilient telecoms Infrastructure

Section 60

We fully support the prioritisation of security and resilience of UK telecoms networks. We also recommend that assistance be given to life-critical and business-critical services in understanding network architectures and options, so that 'over-the-top' services can be re-constructed with appropriate levels of reliability and availability.

Section 61

Recent research into Data and Cyber Security in the Technology Enabled Care sector has been executed by TSA, commissioned by Local Government Association. This study makes specific recommendations to avoid high risk scenarios being encountered in the TEC sector, as it shifts to IP-connectivity. Priority should be given to these recommendations.

Section 4: Postal services

Section 64

It is noted that vulnerable users, particularly in rural locations, attach significant value and trust to UK postal services. It is recommended that this issue be considered as part of any review of Royal Mail services.