

Representing the Communication Services Industry



Fibre Line Calls -product proposal consultation
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Introduction

The [Federation of Communication Services](#) (FCS) represents over 300 businesses delivering products and services via wireless, copper and fibre technology. This response has been prepared on behalf of the Fixed Service Providers and NGA Action Groups within the Federation.

More than 150 FCS members consume WLR and related wholesale products to deliver services to end user customers. A list of FCS members can be found on the FCS website. We estimate that more than half of the 55 CPs who have customers in the Deddington pilot area are FCS members.

Overview

We welcome the opportunity of responding to this consultation on BT Wholesale's proposal for a new Fibre Line Calls (FLC) product.

Competition over current generation copper networks has been based on complementary products offered by Openreach (WLR and LLU) which enable CPs to compete using different business models and to serve different customer types according to their needs. This model has been very successful allowing diversity and innovation to thrive (as evidenced by the very high number of CPs serving customers in a very small exchange area).

FCS members believe that this model should be reflected in the new fibre environment, enabling switchless resellers to compete on a level playing field with those CPs who have their own call servers and networks.

We recognise that the timescales for Deddington pilot limit the degree to which a full range of features can be provided for a wholesale voice service in this initial phase of Fibre Only trials and the demographics of the exchange area mean that this is not likely to be problematic in the short term.

However, we note that Openreach's 2011 consultation on its proposals for Fibre Only Area trials included plans for multiple exchange trials and New Sites (it has already been announced that Deddington is likely to be followed by a further exchange trial based on FTTC). These areas are highly likely to have different demographic profiles to Deddington and this will reflect directly on the features and products required to enable switchless resellers to compete effectively.

It is important, therefore, that there is a clear road map setting out how FLC will be developed beyond the Deddington trial. For this reason, we welcome the statement at 4.2 of the current consultation that BT Wholesale is proposing that FLC will reflect the call features available for WLR3 plus Wholesale calls as much as possible. Our answers to the consultation questions below, therefore, are made in the context of an expectation that FLC will be developed further beyond its immediate deployment as part of the Deddington trial.

Currently, most CPs place their EMP orders for WLR via specialist "Third Party Integrators" (TPIs). Our expectation is that these TPIs will develop similar commercial interfaces for ordering FLC via the relevant BT Wholesale systems, which can be integrated with current services which provide an interface to EMP.

As noted in the FLC consultation document, fault reporting for WLR is currently handled by Openreach who are also responsible for managing the engineering resource deployed to fix these faults. FCS members would strongly prefer to maintain their direct relationship with Openreach to enable them to monitor and manage the repair and to initiate and manage escalations where these are required. It is also important that a range of service levels is available to reflect the needs of end-user customers.

BT Wholesale notes in the FLC consultation document that there is an interaction in the pricing for FVA and GEA orders which heavily favours CPs who can order FVA and GEA as part of the same order. To support effective competition, it is important that CPs ordering FLC from BT Wholesale can benefit from this pricing.

We are also aware that pricing for the current Wholesale Calls product has over many years been based on the concept of volume discounts. WLR, in contrast, is a regulated product which is consumed on an equivalence of access basis. As FLC is being positioned as the successor to WLR for Fibre Only areas, it does not seem appropriate that this type of discounting should be available to larger CPs who would thus gain considerable competitive advantage in these areas.

Finally, on a practical note, not all the CPs operating in the Deddington pilot area currently contract with BT Wholesale so it would be useful to understand the process for them to do so.

Consultation questions

Question 1 – Will the planned feature set meet your requirements for the FOX Pilot at Deddington? If not, what features would you foresee as pre-requisite to your participation?

We await the detail of exactly what features will be provided for FLC during the pilot but welcome BT Wholesale's commitment to replicate WLR functionality as far as possible.

We accept that the demographics of Deddington mean that a limited feature set is likely to be adequate to serve customer needs in the short term but would like to see a clear road map on subsequent development of FLC beyond Deddington.

We are keen to engage proactively to discuss in detail what features should be provided as part of the longer term development. We propose the list included in the NICC document submitted with this response - CP0X (09) 0Y on Open ATA requirements - as a starting point.

Question 2 – Do the proposed order types and interface arrangements satisfy your requirements for ordering the FLC product in the pilot. If not, what additional ordering capabilities would you foresee as pre-requisite to your participation?

Given the low volumes of orders likely to be generated during the pilot, the proposed manually based processes are likely to be adequate in the short term.

However, we draw attention to the points made about arrangements for ordering WLR set out in our introduction and urge BT Wholesale to engage proactively with TPIs at an early stage to map out possible arrangements for development of interfaces for the longer term.

Question 3 – Do the proposed fault reporting arrangements satisfy your requirements for fault management of the FLC product in the pilot? If not, what additional arrangements would you foresee as pre-requisite to your participation?

As noted in the introduction, we would prefer that CPs are able to maintain a direct relationship with Openreach for managing faults, especially where escalations are required (even if the initial fault report is routed via BTW).

Question 4 – Do the proposed commercial arrangements for the FLC Line, Calls, Call Barring and Call Minder charging meet your requirements for the FOX Pilot? If not, what changes would be pre-requisite to your participation?

We would be broadly happy with pricing of features which mirrors current WLR plus Wholesale Calls pricing.

Question 5 – Does BT Wholesale's proposal to make the FLC product available for use in the FOX Pilot at Deddington in June 2013 meet your requirements?

Broadly, yes. However, we wish to see plans for implementation of the phase one product in the clear context of a road map that shows what will be delivered for wider fibre only areas.

We also believe that it is important that the phasing of the introduction of FLC for switchless resellers and FVA for other CPs is managed to avoid providing a potential competitive advantage to any one group of CPs.

Question 6 – Do you intend to participate in the FOX pilot and if so, when do you anticipate placing your first order, and what volume do you anticipate requiring in 2013?

Not applicable - but we plan to take further soundings from our members on their intentions.

Question 7 – What types of end user services do you intend to deploy in the FOX Pilot, for example; do you intend to order only the FLC product, do you intend to order the FLC product from BT Wholesale and the GEA product from Openreach for the same end user, do you intend to order the FLC product and the WBC (FTTP) product from BT Wholesale for the same end user?

See response to Question 6.