

Raf Leadbetter
Consult21 Line Access working group
BT Wholesale

22nd September 2008

Dear Raf

Wholesale Voice Connect Consultation

This response has been prepared on behalf of the members of FCS, the trade association for the UK communications services industry, represented by the Fixed Service Providers Association (FSPA) and the FCS VoIP Group. A full list of FCS members may be found on the website www.fcs.org.uk.

Over 150 companies are represented by the above member groups, who supply a range of fixed telephony services to end-user customers. We are pleased to have the opportunity of contributing to this consultation

FC welcomes the development of Wholesale Voice Connect which we believe will promote choice and competition by providing communications providers with the tools to develop new and innovative services and service bundles. The de-coupling of connectivity from voice services will offer greater flexibility than the current WLR/CPS model and in this sense WVC represents a logical and welcome successor to these products.

FCS members while not all actively engaged in the relevant Consult21 workgroups have been keeping a watching brief in this area since the announcement by Openreach of their plans for Voice Line Access which WVC now effectively replaces. FCS members will be the core market for resale of products based on WVC and we are keen to ensure that the service meets the needs of this market.

We would like to flag up two issues of concern as a part of this brief response:

- The indicative pricing included in the consultation document may make it difficult to offer services which are competitive with existing WLR and LLU based services
- We understand that the proposed 21C ISDN products will not be based on SIP technology since BT takes the view that there is no industry demand for this product which it envisages being replaced by SIP over Ethernet. Feedback from our members contradicts this view and we would urge BT to reconsider their approach in this area.

I trust that you find these comments helpful and we would be very happy to get involved in further discussions on these specific topics or in any wider industry engagement at the point that BT Wholesale feels that this is appropriate.

Yours sincerely



Michael Eagle
General Manager