

Representing the Communication Services Industry



Battery back-up for superfast broadband services which use fibre
optic technology
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Introduction

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

Response

We welcome the opportunity of providing a response to this consultation on Ofcom's proposals for battery back-up for services using fibre optic technology.

The roll out of fibre will bring significant change to the provision of communications services in the UK. The implementation of fibre based technology will also impact on some non-comms services such as smart metering and tele-medicine which may be provided over the same connection. It is critical, therefore, that customers are appropriately protected from events which may cause interruptions to these services.

We broadly agree with Ofcom's proposal to reduce the requirement for the lifetime of battery back up to one hour as standard. However, we believe that end-user customers should be offered an appropriate degree of flexibility and choice. For this reason, we believe that in addition to the ability to opt for additional protection, customers should be able to choose to have no battery back up at all.

FCS members providing services in the fixed sector regard the Openreach network (and networks provided by other providers) as a part of the national infrastructure. It is logical, therefore, that responsibility for the maintenance and integrity of this infrastructure and associated levels of service should rest with the infrastructure provider. It is neither practical nor desirable that any of this responsibility should be devolved to the service providers consuming the wholesale services which run over the network. Ofcom's statement should make it clear that this responsibility, and the responsibility for providing additional customer options, lies with the network operator.

However, we also believe that the duties placed on the infrastructure operators must be proportionate - in order to keep the cost of wholesale services (and thus the cost to the end-user customer) at appropriate levels. Some measure of responsibility for checking the condition of the battery or responding to, for example, audible alarms should rest with the end-user customer (there is a parallel with current practice relating to smoke alarms, DECT phones etc.). For this reason, replacements for batteries provided should also be affordable and easily sourced by end-users. In any case the duties and limits of responsibility of all in the value chain must be clear.

We trust that the above is helpful and would be happy to discuss this response further with Ofcom if required. Responses to the individual consultation questions are shown below:

Question 1: *Do you agree that Ofcom's guidance on battery back-up lifetime needs to be reviewed at this time?*

We agree that this is an appropriate time to review these requirements. Openreach is embarking on a wider scale roll-out of Fibre to the Premise (FTTP) and is currently consulting on "fibre only areas" (including fibre only exchanges).

Other providers of fibre infrastructure are also coming into the market and this is a trend which is likely to accelerate following the trials conducted by Broadband Delivery UK. It is important, therefore, that there is a consistency of approach to the issue regardless of the operator so as not to cause confusion among end-users.

Question 2: *Do you agree with the scope of this consultation as set out in Section 4?*

We agree with Ofcom's view that the consultation should focus on FTTP as connections via copper (including Fibre to the Cabinet - FTTC) will not be affected by power failures.

We also agree that the options identified by Ofcom for consultation are the correct ones. The main objective of the consultation should be to clarify responsibility for the provision and maintenance of battery back-up under the final regulatory requirements.

We agree that the issue of maintenance of service elements provided from the core network (such as access to emergency services), while important, is not impacted by changes in the access technology and not, therefore, directly within the scope of this consultation.

Question 3: *Do you agree that a battery backup facility should always be provided?*

We agree that battery back-up should always be offered as standard by the network operator for all deployments of PATS using FTTP technology. However, we believe that end-user customers should have the ability to opt out and have no battery back-up if they choose. For example, DECT phones will not work in the event of a power cut and the provision of battery back up to the ONT will not guarantee service where this type of equipment is used.

Provision of battery back-up at premises using this type of equipment, therefore, arguably serves no purpose and universal provision will have an unnecessarily detrimental impact on the environment.

Question 4: *Do you agree that the proposed minimum battery longevity of 1 hour is appropriate?*

Based on the evidence provided by Ofcom in the consultation, one hour seems to provide an appropriate level of protection for the majority of customers.

Question 5: *Do you agree with our proposed approach to address the needs of individual customers requiring additional protection?*

We agree that enhanced protection facilities should be provided on an optional basis.

We believe that it is important to explicitly require that all infrastructure operators and wholesale providers must make the Ofcom specified enhanced services available consistently across all networks and to all service provider and reseller CPs on an equivalent basis.