

RESPONSE TO COPPER RETIREMENT – DETERMINING WHEN COPPER REGULATIONS CAN BE REMOVED

Introduction

There are a number of statements contained in the Consultation, that together would need further clarification and technical explanations.

These statements are:-

“Openreach plans to migrate customers to the new network and then withdraw copper services.”

“Earliest that copper charge control will be removed will be December 2022 in Salisbury and in June 2023 in the 117 other exchange areas.”

Openreach’s fibre roll-out is at its relative early stages --- would allow Ofcom to better consider roll-out experience ---.”

WFTMR proposals would allow Openreach to start implementing the stop-sell from April 2021 onwards.”

Openreach --- does not intend to retire copper until it has also switched – off PSTN in 2025.”

“ ---- migration to IP and subsequent PSTN switch -off is likely to progress at a faster pace than copper retirement and for most areas complete retirement of copper services will take place some years after PSTN switch – off.”

“Consumers and businesses will therefore be able to use copper based services for their voice and broadband for many years to come.”

The above statements produce the following questions:-

Is it not possible to migrate to VoIP on an exchange by exchange basis?

Why wait until 2025 to switch – off the PSTN?

It seems unrealistic not to be able to gain the benefits of VoIP until after 2025.

What technical barriers are there to migrate to VoIP on an exchange by exchange basis?

What technical procedures are to be employed in the migration to VoIP services?

The second paragraph of 2.13 would seem to indicate that migration to VoIP will occur in Salisbury and the other 117 exchange trial areas.

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Section 3 Exchange completion

Question 1

I would consider that information gathered from the implementation of fibre roll – out (on a day to day basis) within the 118 exchange areas, would provide sufficient data for Ofcom to decide the “circumstances in which premises can be excluded”.

The Demise of the ‘Office’ and the success of ‘Home Working’

There is growing evidence that ‘Home Working’ is to become the ‘NORM’ in the future as the UK recovers from the Covid – 19 pandemic. (Refer to ‘The Guardian’ 14/ 8/ 20 - “The age of the office is over. Britain’s towns are its future”).

The above will shift the office workers FROM the city centres to city suburbs and surrounding towns.

Hence, Geographic Area 2 and 3 will need major reassessment in investment support compared to the current Ofcom proposals for WFTMR.

I CONSIDER THE EXISTING PROPOSALS ARE NO LONGER FIT FOR PURPOSE FOR 2021 – 2026.

Submitted by: GDA.