

Your response

Question 1: Do you agree with our proposals to issue guidance under GC C2.3, GC C1.3 and GC C1.5 to clarify:

- (1) that the description of broadband services should be consistent and include a one- or two-word description of the underlying technology; and
- (2) that the use of the terms 'fibre' and 'full-fibre' in the information that is provided to customers should only be used to describe fibre-to-the-premises (FTTP) services.

Question 2: Do you agree with our proposal for providers to give an explanation of the one- or two-word terms used to describe the service, in a way that can be easily accessed by customers?

Please provide evidence in support of your views.

Your response

Confidential? – N

Agree with (1).

Disagree with (2): I think this is inadequate given prior use of the term 'fibre' to describe the network, and hence very high speeds (eg much publicity about laying fibre in the street for Nynex [ancient] and City Fibre). A concise addition might clarify that this refers to the final link (cabinet to premises), eg 'full fibre to you' but see response to Q2 below.

Confidential? – N

Disagree : I do not believe that the network technology is generally useful to the customer; the point of interest is the weakest (slowest) link in the chain and that is generally the last mile (in this case, the cabinet to premises). So "full fibre" meets this but other terms, including 'fibre' and 'copper', are inadequate. The network is relevant only insofar as the cabinet may be speed limited in its feed to the final link.

'Copper' is particularly ambiguous since it spans ADSL, its derivatives, and co-ax. ADSL is limited to speeds in single digit Mbs while co-ax can supply Gbs speeds (example: Virgin Media over ex-Nynex infrastructure). This means that false understandings are easily made (eg fibre is always faster than copper). Discrimination between particular fibre technologies/implementations are likely also to be relevant to speeds in future. Wireless "Broadband" delivery by mobile operators may also figure (or may fade away!).

Rather than descend into the minutiae of technology variants (which will inevitably become outdated anyway), a qualifier is needed for these terms that describes relative speeds. The USB speed naming suggests a useful way forward (Low speed, Full Speed, High Speed, Super speed). The USB names have "just grown" yet remain reasonably intuitive and, importantly, are open-ended. With a fresh start for UK Broadband, a better, single hierarchical spectrum of adjectives could be adopted with coverage from low-speed copper to high speed fibre; the defined meaning (speed range) of each would allow a technology-independent description to complement "copper"/"fibre" (and wireless/future technologies) in a user-friendly fashion.

Evidence: Co-existence of very slow to very fast copper networks. User interest in delivered speed.

Successful use of a hierarchy of adjectives by USB despite an ad hoc start.

See https://en.wikipedia.org/wiki/USB#System_design for USB naming (but please ignore the latest numerical scheme).

Please complete this form in full and return to broadbandinformation@ofcom.org.uk.