Your response

Question	Your response
Question 4.1: Do you agree that if BT's migration to an IP network is unpredictable, it could result in increased charges for providers routing calls to its network? Are there any other issues that might arise as a result of its migration?	We should say that BT are forcing us to migrate off TDM to IPEX to our financial detriment. They have to provide interconnects to DLEs, but as we connect to DMSUs we don't have that protection. I also believe there is potential for BT to abuse the migration of number blocks from TDM to IP and would consider monitoring to be required to ensure they don't say number blocks are on a system they're not in order to increase their revenue
Question 4.2: Please state which of these measures you consider would be appropriate for securing efficient migration and why?	I'd favour a flavour of option 3 as this provides most flexibility. If BT want to migrate to IP, then OLOs shouldn't be penalised for doing so. This needs to apply to DMSU interconnects as well as DLEs
Question 4.3: Would the regulation of charges for media conversion, switching and conveyance for calls routed via IP networks be an effective means of preventing excessive charges and promoting an efficient migration to IP?	I'm in favour of regulated charges then OLOs know what they're dealing with – better certainty is good for all
Question 4.4: Do you agree that it remains appropriate that telecoms providers maintain their discretion to designate a single POI at which the FTR will apply?	This could result in increased charges if the POI isn't anywhere near us. It would make sense to enforce a small number of geographically separated PoIs (unless of course, distance is not a cost factor for IP interconnect circuits)
Question 4.5: Do you agree with our assessment about how BT's market position in relation to interconnection might change during migration to IP?	No comment
Question 4.6: Do you agree that there is unlikely to be a need to impose regulation on BT's interconnection circuits once migration to IP is complete?	I think regulation should be retained as BT will still have SMP. As a small OLO, an unregulated IP interconnect environment could allow BT to force us to interconnect with other providers to the detriment of the service we can provide our customers
Question 4.7: Do you agree that we should continue to regulate BT's TDM interconnection circuits as the industry migrates from TDM to IP based networks?	Yes, to prevent BT from forcing OLOs like us down certain roads unnecessarily. Regulation provides certainty to small OLOs like us

Question 4.8: Do you agree that it would not be necessary to impose regulation on interconnection circuits at BT's IP network during migration?	I think there should be regulation for the same reasons as Q4.6 & Q4.7
Question 5.1: Do you agree that BT's role is less central to the provision of end-to-end connectivity and that telecoms providers now have a choice of transit providers with whom they can interconnect?	Yes, BT's role is less central, however the alternatives may not be better in terms of efficiency and service supplied
Question 5.2: How might the transition to IP networks change the pattern of interconnection and how might this affect how E2E connectivity is achieved?	I can foresee UK networks moving to a partial mesh between all sorts of providers and consequently many more 'hops' between networks to transit a call. I can foresee this resulting in more potential points of failure, and more hassles with resolving faults (which will become more prevalent due to lower standardisation in IP interconnects than TDM) **This will make all network operators lives' much harder and, most crucially, reduce confidence in telephony**. It is **highly desirable** from an engineering and **customer service point of view** to retain the current model of few major carriers with high standardisation and national reach. The problems of multiple hops could be reduced significantly with standardisation and/or regulation of IP networks.
Question 5.3: Do you agree that General Condition A1 is sufficient to ensure that telecoms providers can obtain interconnection and that additional access obligations may no longer be required to ensure end-to-end connectivity? If not, please explain why and what obligations you think are necessary.	Although condition A1 is enough in theory, in practise it may not be; and careful monitoring would be required to ensure small operators like ourselves do not become marginalised and that the standard of UK telephony does not drop and reduce confidence in customers. I see my customers moving to OTT services to contact others in countries where the quality of the telephony networks are poor, this is highly likely to happen in the UK if regulators don't keep an eye on quality of service supplied by OLOs (sufficient call quality, low incidence of faults, and swift resolution of faults when they occur).
Question 6.1: Do you agree with our initial view that a lack of standardisation of IP interconnection may give rise to a risk of consumer harm?	Lack of standardisation in IP interconnection is already resulting in consumer harm - faxes don't work, M2M comms doesn't work, faults are more frequent & take significantly longer to resolve.
Question 6.2: To what extent is there	I believe an industry-wide solution is required.

divergence among telecom providers in respect of the IP standards they are using? Do you consider a lack of standardisation of IP interconnection to be (or likely to be) an isolated issue or more widespread, which may require an industry-wide solution?	Although the UK operators we interconnect with seem to be following the BT interconnect specs in terms of codecs offered & used, the options for messaging sequences and contents vary. This makes faulting incredibly time-consuming compared to TDM. Often there simply appears to be no resolution for certain faults other than to put the traffic back to TDM.
Question 6.3: What measures, if any, do you consider may be appropriate to address risks arising from a lack of standardisation of IP interconnection?	Forcing OLOs to work to NICC specs would be a start. This would increase the pressure on equipment manufacturers to support those specs, at present the manufacturers simply shrug their shoulders and say their kit provides basic international functionality. Today we can look at a TDM interconnect fault and lay the blame on a particular operator whose equipment isn't conforming to UK specs, with IP that's not possible – both operators simply blame each other and the fault doesn't get fixed.
Question 6.4: Would it be useful to consider the case for intervention in relation to technical standards for interconnection ahead of our next market review?	The sooner things can be standardised the better for all concerned, and most importantly, confidence in the telephony network. Rewind to the pre-IP days and you could be confident your UK telephony would be good 99% of the time, and if you had a fault it would be fixed quickly. You can't do that today, and if things get worse the problems will escalate exponentially
Question 7.1: What are your views on the factors that we have highlighted as having a bearing on the setting of termination rates? What other developments should we consider?	No comment
Question 7.2: What are your views on the options we present for regulating the fixed and mobile call termination markets? Which appears to be the most appropriate regulatory option?	No Comment