



Removing fax from the universal service obligations on BT and KCOM

KCOM's response to Ofcom's consultation December 2022

- 1.1 As the designated Universal Service ('USO') provider in the Hull Area KCOM Group Limited ('KCOM') agrees with Ofcom's proposal to implement changes to the Universal Service Order by amending the definition of 'Telephony Services' in BT and KCOM's universal service conditions to remove the reference to facsimile transmission.
- 1.2 KCOM has started migrating customers from its copper network to its full fibre network, all-IP network. We aim to replace our copper network by the end of 2024 with all customers being provided with voice and broadband services over a fibre to the premise connection.
- 1.3 Removal of fax services from the Universal Service Obligations would not preclude their continued provision. However, as Ofcom states, fax machines use voice-band data carried over the PSTN voice service and require both ends, and intermediary networks, of the fax call to support an analogue voice-band data channel for the analogue data. The nature of all-IP (digital) networks means that the timing and synchronisation that is relied on by fax for the duration of the transmission cannot be guaranteed. This means that the successful delivery of facsimile data cannot be guaranteed over all-IP networks.
- 1.4 In these circumstances it would not be appropriate to continue to oblige KCOM and BT to continue to offer fax services.
- 1.5 Additionally, given that the aim of the Universal Service Order is to ensure that a minimum set of telephony services are available to people who need them and the availability of a range of alternatives to fax, such as email and online document management platforms (many of which are free of charge), KCOM agrees it is unnecessary for the provision of fax to continue to form part of that minimum set of telephony services under the universal service obligations.