

Additional comments:

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

Yes, with the change to fibre technology it is important that all customers understand the ramifications of this change and how it will affect them. Many customers rely on the telephone in the event of a power-cut and will not realise that the change to fibre communications will mean a restricted time access for communications until the "battery" runs out.

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

No.

The scope of this consultation also needs to take into account the power backup for the local (roadside) cabinet and exchanges. (There is no point a customer asking for 8 hour backup to their home telephone if the local exchange has only 4 hour backup power).

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

Yes.

Customers expect and the NGN's should provide the back up necessary for the telephone to work in the event of a power failure. The customer should have access to call the emergency services and the utility companies.

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

No.

The power outages in the UK vary by geographical location and any proposed battery backup needs to take this into account

The European standards for remotely monitored security systems require a minimum of 8 hours battery back up. But the BSIA realise the difficulty of supplying this sort of backup.

If it is possible 4 hour backup would be desirable and also the ability for the customer to connect an extra power supply to the fire socket if necessary.

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

No,

The ofcom approach to customers requiring additional protection is unclear and also how this additional protection will be provided is vague.

There needs to be a clear, unambiguous statement of intent of how communications providers

will provide this additional protection and also how communication providers will provide the facilities for other industries to provide the additional protection