

BATTERY BACK-UP FOR SUPERFAST BROADBAND SERVICES WHICH USE FIBRE OPTIC TECHNOLOGY

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Cable&Wireless
Worldwide

SUMMARY

Cable&Wireless Worldwide welcomes Ofcom's consideration of the scope of battery back-up for broadband services. We believe it important that some degree of backup be provided, in order to ensure consistency with copper-based services.

Consideration of the longevity of the backup will inevitably involve a degree of pragmatism, balancing the statistical risk of power outage events coinciding with emergency calls, against onerous backup requirements imposing extra cost (both financial and environmental) and inconvenience for consumers. At the extreme, it would be unfortunate if a requirement for a prolonged backup facility caused the batteries not to be properly maintained, resulting in no backup being present.

We believe the proposals put forward by Ofcom represent a reasonable compromise that can be used as a pan-industry framework.

ANSWERS TO OFCOM'S QUESTIONS

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

Cable&Wireless Worldwide agrees that it is appropriate to set guidance now, prior to mass adoption of fibre to the home technology. However, we believe that this should be the start rather than the end of this process, with a need for periodic checks to verify that empirical results match the predicted performance.

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

We agree with the scope. In a "brownfield" scenario there should in theory be parallel copper available which would facilitate a line-powered voice call. However in practical terms, with multiple communications providers the operator of the fibre-based service cannot be sure of the existence of a live copper connection, so it is pragmatic for the regulatory guidance to assume it is not present hence adopt common requirements across "brownfield" and "greenfield".

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

Cable&Wireless Worldwide agrees.

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

Cable&Wireless Worldwide agrees that this strikes the right balance between facilitating the majority of emergency calls, financial and environmental costs, and minimising the risk that consumers simply do not replace the batteries when warned to do so.

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

Cable&Wireless Worldwide agrees with the principle of longer backup for individual customers that require additional protection.

However, in certain circumstances we would query how the communications provider would be aware that this is the case. For example we note in Section 6.12 that it is proposed that higher capacity batteries be provided for customers with a history of long-duration power outages. However, unless the customer informed the communications provider that this was the case (and as an individual, a customer may not know that their supply was less reliable than the norm), there's no way that the provider could have the knowledge that higher capacity batteries were required.