

**Response to the Ofcom Consultation on
Battery back-up for superfast broadband services which
use fibre optic technology**

**(Proposed guidelines on General Condition 3 for next
generation fibre access)**

From Ericsson Ltd

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Introduction

Ericsson welcomes the opportunity to respond to this consultation on battery back-up for FTTH. We see it as extremely timely and necessary to ensure that consumers receive the full benefit of FTTH and similar technologies which do not include copper based power feeds. The current government plans being, implemented with the help of BDUK and Defra, make it an ideal time to clarify this topic and give clear implementation guidance to operators and manufactures alike.

Responses to questions

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

Ericsson agrees with Ofcom that it is now an appropriate time to review the guidance on battery back-up lifetime. We arrive at this conclusion based on what we see is a likely surge in installations of this type as a result of the current Government Super fast Broadband policy. We observe that the range of installing operators is likely to be much wider than the traditional telecommunications operators and their incumbent suppliers. We urge Ofcom to consult more widely than the major operators in determining the details prior to the next consultation.

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

Ericsson mostly agrees with the proposed scope of the consultation. However we have observed that with the DSL task group of NICC operators are considering whether a new insertion point should be specified at the DP (Distribution Point). The available bit rate may be increased to a maximum if the copper loop ceases at the DP because the ANFP power reductions would not need to be applied. In these circumstances the PSTN telephony would be a derived service which has the same characteristics as FTTP in terms of the requirements of the General Conditions. Ofcom could take this opportunity of ensuring that the consideration extends to such cases since they are equivalent to FTTP in a technology neutral way.

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

Ericsson agrees that a battery back-up facility should always be provided. The elements suggested in Principle 1 seem to be appropriate.

Furthermore, the scope of what is being backed up is essentially Voice Telephony for the purpose contacting emergency services. Paragraphs 2.4 and 2.5 reflect (correctly in our opinion) the requirement should extend to VoIP services. In that context, the need is being extended to protect a *data service*. As technology and societal needs evolve, we should consider if the data service should be protected in a wider sense. Ericsson has predicted that 50bn devices will be connected by 2020. In the future it is conceivable there may be life or at least, health dependencies on the data service.

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

Ericsson agrees with proposed Principle 2 that minimum battery back-up longevity should be 1 hour. We are pleased that this will be kept under review as suggested. Ericsson would be happy to support Ofcom in the analysis of technical options both now and in the future.

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

Ericsson agrees with the proposal to address the needs of individual customers requiring additional protection. We would however caution against the assumption that this is to be a bespoke solution agreed by the operator. We believe that customers who suffer from longer outages should benefit from the ability to have choice in communications provider. We suggest that a standardized facility and means of interconnection to the standard back-up facility is required. In that way the supply of the enhanced facility can be made independent of the operator and his initial chosen manufacturer.

We believe that the use of enhanced facilities could become more prevalent in future as there is a risk that Electricity Supply capacity may be outstripped by demand more often than has happened in the past.