

Additional comments:

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

Fujitsu agrees that there is a need for clarity on the requirement to provide battery backup for PATS services delivered using Fibre to the Premises (FTTP).

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

Fujitsu believes the scope of the consultation should be clearer. While one of the characteristics of FTTP deployments is a requirement for mains power at the customer premises, there remain a number of different deployment scenarios that should have been addressed by the consultation:

1. A PATS provider delivering services using a mains powered ONT at the customer premises
2. A PECS provider delivering services using a mains powered ONT at the customer premises
3. A communications provider deploying FTTP with no active equipment at the customer premises

Scenario 1 appears to be the focus of the consultation. However, as part of the WLA consultation Ofcom stated the key characteristics for VULA. This included allowing Service Agnostic Access and allowing Access Seekers (or ALA Users in ALA terminology) control of the CPE. In addition, the consultation stated that 'VULA should not be inextricably link, or bundled, with other products, such as a voice product'. These requirements generate the additional scenarios listed above, where an FTTP ONT is developed without the support for POTS (scenario 2) and the access network provider offers a 'wires-only' fibre interface to the network (scenario 3).

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

With reference to the response to question 2, the requirement to provide battery backup should depend on the deployment scenario. In some cases this will change for a given customer premise over time. Requiring battery back-up for all FTTP deployments is a generalisation that will unnecessarily increase the cost and complexity of deployment and provide a barrier to the deployment of superfast broadband services delivered using FTTP. In scenario 1, where communications provider uses capabilities of an ONT to deliver PATS, the requirement for battery backup can be justified.

In scenarios 2 & 3, the access network provider is supplying a PECS service which may or may not be used to carry PATS. The reason for not providing a PATS service could be if the customer premises is a business premises with other arrangements for voice or a residential premises where the customer chooses not to subscribe to a fixed line voice service.

In scenario 3, the ISP may control the CPE. Broadband subscribers might also choose to substitute any CPE supplied by the ISP with independently sourced alternatives.

Fujitsu proposes that it should not be required to provide battery backup in the absence of a PATS service. It should be the responsibility of the communications provider that wishes to offer PATS to ensure that suitable availability for that PATS service can be ensured. The

PATS provider will need a service level specification for the network service used for PATS transport which will include availability along with delay, jitter and frame loss. Given the likely lack of an alternative delivery mechanism for PATS in FTTP deployments, Access Network Provider deploying FTTP will need to provide at least one solution allowing an Access Seeker (ALA User) to offer a PATS service. This could be by:

Y Providing a wires-only interface and a service with an appropriate SLS

Y Providing battery backup for Ethernet interfaces an active ONT

Y Providing an embedded ATA within an ONT which functions following a failure of mains power

In the first two cases, the PATS provider will also need a battery backup solution for their CPE. Where battery backup is provided for an ONT, it may be the case that not all the customer interfaces on the ONT are required to function following a loss of power.

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

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