

## **RE: BATTERY BACK-UP FOR SUPER FAST BROADBAND SERVICES WHICH USE FIBRE OPTIC TECHNOLOGY**

Thank you for the opportunity of responding to Ofcom's consultation on Battery Back-up of Super fast Broadband Services Which Use Fibre Optic Technology. This consultation response is made by Independent Fibre Networks Limited (IFNL).

### Structure of this response

This response consists of this cover letter and the attached Appendix. These should be read together.

This cover letter sets out a summary of our general comments so that you may understand the context in which we have answered the specific questions raised by Ofcom. As to the specific questions we have made a number of points about the comments in the consultation paper.

### General Comments

We set out below a brief summary of the points made. We have not included in the summary our responses to all of the questions asked; merely the key ones. In summary, therefore we contend that;

- Vendor community needs clarity on the UK's battery back-up strategy so that it can support service providers with space saving and cost effective solutions that also benefit consumers.
- Battery back-up should be part of an opt-in approach whereby the consumer has a choice to 'use or refuse' the service, removing any un-necessary burden on the consumer where battery-backup is not required.
- The mandatory regulation of the mass deployment of battery backup units<sup>1</sup> conflicts with corporate environmental policies.
- Both overbuild and fibre only developments should be treated in the same manner and both should be subject to the same requirements, as overtime is will be difficult for the consumer to easily distinguish between the two.
- Addressing individual needs at a network level can become un-manageable, as the type of resident and any potential disabilities are not known at time of installation. Consumer churn also compounds this issue.
- IFNL agreement that if a consumer opts for battery backup, a 1 hour solution is the most pragmatic and sustainable as this approach provides a good compromise between ensuring access to emergency services at all times, whilst being cost effective and practical from a network operator and resident perspective.

### Next Steps

Please do not hesitate to get in touch using the contact details provided below if you would like to discuss our response in more detail.

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<sup>1</sup> which based on the Ofcom research demonstrates that is highly unlikely to be used during its 5 year life