

Battery back-up for superfast broadband services which use fibre optic technology

Response by KCOM

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KCOM Group delivers communications services to a range of businesses and consumers throughout the UK under a number of different brands. In Hull and East Yorkshire, KC provides communications services to businesses and consumers and has recently announced plans for an initial deployment of both FTTP and FTTC solutions to 15,000 homes. Final planning is currently taking place for an initial trial which will test both solutions. We therefore have a very real interest in requirements relating to battery back-up and set out our comments below.

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

KCOM agrees that it is appropriate for Ofcom to review its guidance on battery back-up lifetime. Since the Ofcom statement on next generation access provision in new build in 2008 and the additional guidance on battery back-up published in 2009 there have been a number of changes in the market. Most notably plans for and deployment of NGA networks have accelerated considerably and we agree that there is likely to be a significant increase in the deployment of FTTP over the coming years. This push for wider deployment of NGA makes it timely to review previous guidance, both in terms of actual provider and customer experience in relation to battery back-up and to ensure that guidance is appropriate for wide-scale deployment of FTTP.

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

We agree that it is appropriate to consider battery back-up in the context of FTTP deployments, both "overlay" and "new-build" solutions where the voice element of the service is provided over the fibre connection.

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

KCOM would suggest that there is an alternative option which has not been considered by Ofcom, namely that customers be given the option of choosing whether or not to have battery back-up provided as part of their service.

This would provide a flexible option which would allow CPs to meet the requirements of GC3 while overcoming customer issues associated with both initial installation and ongoing maintenance of the battery back-up solution.

If this were to be pursued as an option we envisage that providers would have an obligation to offer battery back-up. Where customers chose not to have battery back-up



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they would need to be provided with full and clear information about the implications of that choice as part of the sales process. We do not see this as being a major issue either from a sales perspective or in terms of customer understanding. As Ofcom notes, the use of DECT handsets is now widespread and customers are already familiar with the limitations inherent in these handsets.

We believe that this alternative approach would go some way to addressing the consumer and stakeholder implications identified by Ofcom. In particular it would allow customers to assess their options in light any concerns regarding the accommodation and maintenance of a battery back-up solution. There is also the potential, depending on the extent of customer opt-out, to decrease deployment and installation costs for CPs.

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

KCOM agrees that the proposed minimum battery longevity of 1 hour is appropriate where battery back-up is required.

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

We agree that there will be a small number of customers who may require additional protection beyond 1 hour. At this stage we believe it would be difficult for Ofcom or providers to reach any firm conclusions regarding an appropriate solution without the extent of the need being understood. We would expect to consider this issue further as part of any launch of FTTP services delivered without a copper voice connection and would be happy to engage further with Ofcom on how the needs of customers requiring additional protection are met.



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