

Additional comments:

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

Since there are now significantly more live FTTP services in the UK (and the fact that Network Providers are adopting different standards) then it seems an appropriate time to review this guidance. [X] also notes that Openreach is planning to launch its initial "voice over FTTP" services later this year so clear guidance is required.

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

[X] agrees with the stated scope of Ofcom's consultation.

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

[X] believes that Ofcom's proposal can be seen as being appropriate based on evidence provided in the consultation (e.g. the statistics provided on 'power outages' in the UK).

However, [X] believes that Ofcom should continue to measure the relevance of mandating provision of a battery back-up facility. For example, further increases in mobile / VoIP telephony might mean that the protection afforded to customers through the battery back-up is no longer relevant or cost-efficient.

[X] is of the view that FTTP Access Operators should provide a facility allowing for the generation of alarms (to the relevant CP) when there is an issue with the battery backup facility at an end-user's premise. This allows any failures in the back-up service to be identified and rectified in a timely manner.

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

If a Battery Backup facility continues to be mandated by Ofcom, [X] agrees that the proposal for reducing the required minimum battery longevity to 1 hour is appropriate.

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

[X] agrees that 'vulnerable customers' should be considered separately. For example [X] agrees that for customers who are identified as 'vulnerable' (e.g. house-bound, physically disabled or infirm), it may be appropriate to provide a longer battery back-up facility. As all CPs have an obligation to provide such customers with a "Priority Fault Repair Service" for their voice service, the requirement to provide battery back-up for FTTP voice services could be mandatory for such customers.