Additional comments:

The battery analysis in Section 5.33 is incorrect. If the ONT / ATA requires a 12 Volt supply (as the linked items do) then you need 10 cells in series to give you the 12v. The mAh capacity of the cells will need to be higher for longer duration or higher power draw, and you may need two batteries of 10 cells each in parallel, but you will need at least 10 cells in any scenario.

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

Yes

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

Yes

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

No. There should be an obligation to offer one, but it should not be mandatory. There is no obligation for a consumer to have a landline telephone so it is illogical that provision of a battery backup for same should be obligatory.

A consumer may choose to power the ONT along with their phones and computers by a UPS for example, making a separate battery backup redundant.

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

It seems reasonable. I do believe that the need for an emergency call and a power outage could be related events, for example if a fire or lightning strike caused the outage or if powered medical equipment was compromised.

So the probability of needing a landline backup is the product of the probability of power loss, probability of need to make a call, probability of lack of mobile alternative, etc.

1 hour is enough time for a consumer to make contact with assistance and get help in place while the landline is available.

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

Yes, the ability to purchase enhanced capacity backups or to use generator or UPS systems in special cases is appropriate.