Question 1: What can Ofcom do to encourage timely standards development for new build NGA wholesale access products and interfaces? Which industry body is best placed to undertake the standardisation of these products and interfaces? What action should Ofcom take if these standards fail to materialise?:

I think consideration should be given to the standards that already exist within the industry and these adopted to form a standard policy that can be used. BT use a number of devices to deliver services using a technology other than copper, one such device would be an Optical Network Translator. Documentation and specification would have already been developed for this device and although setting a preference to one device is not ideal, I believe the principles of such devices could help in the development of the policy.

The major telecom providers and industry experts, with a guidance note to develop and generic terms of reference for a device that can be mass produced without any one of the providers having IPR over the technology or the software, open source approach as such. This should be governed by Ofcom to ensure compliance and a product is developed that will benefit its users.

Legislation is an option ensuring that the citizens receive services that will benefit them and improve quality of life and well being. Also allow citizens access to services beyond our current reach, due to restrictions on the current technology, which our European partners have benefited from for many years.

Question 2: Do you agree with Ofcom?s approach to promoting competition and consumer choice in new build fibre access deployments?:

Possibly the most important part. As mentioned in the consultation document, the UK has benefited from competition in the service provision of data services. This has certainly benefited the consumer and it would be a mistake not to encourage this within any new infrastructure. LLU has been the driver for competition within this sector and a variation of LLU is certainly possible with Fibre, possibly based on light frequencies rather than physical wires?

Question 3a: Do you a. believe that the existing obligations must be met by replicating the existing copper products, or that an alternative approach could be satisfactory? What are the implications of replicating existing products on fibre?:

I don?t believe that using copper or products of a similar ilk is the correct way forward. Meeting obligations should be done using modern and future proof technology. Under the USO of power to the phone, this should be removed to allow fibre or similar technologies to be used to deliver highspeed and reliable services.

Question 3b: Do you agree that SMP holders rolling out fibre do not need to roll out a copper network in parallel solely to meet their LLU obligation?:

I agree with this statement that copper should not be rolled out to meet LLU or USO obligations, this increases costs to the supplier as well as the developer. There are other ways of providing LLU via fibre be it frequency sales or bandwidth requirements.

Question 3c: Do you agree with Ofcom?s approach in relation to WBA and new build areas?:

I agree with the approach but it may be difficult to achieve without the critical mass of customers on the new infrastructure that will buy the services to make it sustainable. WBA over mixed infrastructure types can also be costly and may not make good business sense. In which case in the short term there maybe a requirement to give a monopoly to service providers in different areas who are able to make a business case and ensure sustainability of the new infrastructure. Once the UK has reached a level that the new infrastructure can deliver a NGB to the majority would the WBA become viable. Other issues for WBA would be privately developed networks e.g. CHP provision, Thames Gateway, Greenwich and possibly Ebbsfleet. WBA and wireless could be an issue e.g. WiMAX in Milton Keynes.

Question 3d: Do you believe that the WLR obligation must be met by replicating the existing copper product, or that an alternative approach based on an ALA-type product would be satisfactory?:

Over fibre I believe ALA is the way forward or the provision of buying minutes similar to that currently provided by VoIP service providers. The WLR obligation should be removed.

Question 3e: Do you believe that the CPS obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?:

ALA again

Question 3f: Do you believe that the IA obligation must be met by replicating the existing copper product or that an alternative approach based on an ALA type product would be satisfactory?:

ALA

Question 3g: Do you agree with our proposal to interpret GC 3.1 (c) as being met through the provision and use of a battery backup facility to maintain uninterrupted access to emergency services in new build developments?:

I believe this will be costly and a number of health and safety regulations would need to apply. The batteries would need to be managed and serviced regularly to ensure the battery can hold a charge or has not developed a fault, leaked or has become hazardous to human health, who would be responsible? As most home phones are power reliant e.g. DECT, wireless and the excessive use of Mobile phones by the public I believe the battery backup for the phone service is not feasible or required. Any legal requirements for this should be reviewed.

Question 4: Do you think access to the duct network, including non telecoms duct, is a potentially feasible means of promoting competition in new build? If so what types of commercial and operational models could successfully support such access arrangements in the UK?:

I think this is probably the most feasible way to open up competition for the delivery for future services using different types of infrastructure technologies. By providing legislation under S.106 or tariffs on new developments, ducting could be provided as a matter of course similar to Gas by the developer. By providing ducting from a focal point on the development site to each of the dwellings or units would allow true competition of delivery of services.

The rental of space in the ducting is a way of attracting revenue from the ducting to ensure its support and management. Other options include RSL, or management company ownership and cost is attracted from covenants placed on the dwellings. The installation of the ducting is carried out and paid for by private enterprise, the attraction of which is an agreement of support for a number of years for the privilege of the provider having exclusive rights to deliver a fibre direct to each dwelling. The ducting would of course remain open for other providers to lay its own infrastructure. Local authority adoption is an option with the authority attracting revenue through the rental space in the duct. Early gap years of cost to ensure sustainability would need to be agreed by the developer via the planning process and s.106 to ensure sufficient funds are available until the development reaches such a level that the cost it attracts exceeds or meets the operational costs.

The below link is reference to Data Ducting for new homes and options of ownership and cost.

http://www.communities.gov.uk/publications/planningandbuilding/dataductinginfrastructure

Comments:

It is clear that the current infrastructure is not capable of providing the bandwidth or the speeds needed for todays consumers. I envisage in the very near future that TV and on demand services will become the norm and we will need an infrastructure that can support this. Increasing costs and injecting monies into a old infrastructure looking at ways of improving it may reach a cost so prohibitive that it become unviable. The option is clear that a new infrastructure is needed and costs will need to be met throught legisaltion on developers, land owned by central government is used and value adjusted to support a new infrastructure and meet the costs,. Changes in the

planning process and s.106 changes are required.

The use of existing networks including waterways, sewers, slot cutting etc is an ideal way of delivering a retro-fit type infrastructure to speed up the delivery of a new infrastructure country wide and an injection of monies from treasury to start retro-fitting the old infrastructure.