

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Consultation on the general conditions relating to network functioning, public payphones, directory information and numbering

To (Ofcom contact): Selene Rosso

Name of respondent: Alex Mather

Representing (self or organisation/s): The Internet Telephony Services Providers' Association

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Alex Mather

Signed (if hard copy)



Internet Telephony Services Providers' Association

ITSPA Response to Ofcom Consultation on the General Conditions relating to network functioning, public payphones, directory information and numbering

About ITSPA

The Internet Telephony Services Providers' Association (ITSPA) represents over 90 UK businesses involved with the supply of next generation communication services over data networks to industry and residential customers within the UK. Our traditional core members are VoIP providers. ITSPA pays close attention to both market and regulatory framework developments on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within both national and international markets.

A full list of ITSPA members can be found at <http://www.itspa.org.uk/>

Introduction

ITSPA welcomes the opportunity to respond to Ofcom's consultation on the General Conditions relating to network functioning, public payphones, directory information and numbering published on 2nd August 2016.

Please note that certain aspects of the ITSPA response may not necessarily be supported by all ITSPA members. Individual members may respond separately to this consultation where a position differs. However, the ITSPA Council is confident that this response reflects the views of the overwhelming majority of ITSPA members.

General Comments

We welcome Ofcom's proposals to rationalise the definitions in the General Conditions so that rather than various terms being defined in different places throughout the General Conditions (which is confusing) all definitions will be combined and set out in one place in a separate annex ensuring consistency of terminology throughout the General Conditions as a whole.

We also welcome Ofcom's proposal to consolidate in a single Condition those General Conditions that address related issues, for example those General Conditions dealing with emergency services in a single Condition that would combine the current General Condition 3 (Proper and effective functioning of the network) and General Condition 4 (Emergency call numbers).

Ofcom's position that the General Conditions should, where possible, be capable of being understood on their face without reference to additional information contained in consultation documents, guidance or explanatory statements etc. is also welcomed. Ofcom's proposal to include a series of short recitals to the General Conditions, setting out briefly the purpose of each Condition will go a long way to making the General Conditions more understandable.



Internet Telephony Services Providers' Association

We believe these initiatives will make it more straightforward to navigate through the General Conditions and to understand the compliance requirements placed on our communications provider members. A clearer understanding of the intent and meaning of the General Conditions goes hand in hand with helping ensure general compliance.

Of particular interest to ITSPA members is Ofcom's proposal to move certain of the requirements in Annex 3 of General Condition 14 to General Condition 3. This is a sensible approach and in line with the objective of consolidating the General Conditions that address related issues into a single Condition.

Ofcom's view that it is no longer necessary to require VoIP providers to inform customers that the voice call service as a whole may cease in the event of a power cut/failure or a failure of the broadband connection (currently required under Annex 3 to General Condition 14) is most welcome. When Annex 3 to General Condition 14 was first introduced it was against the background expressed at the time by the traditional communications providers that VoIP was something of an unknown quantity. However, in the subsequent years following the inclusion of Annex 3 to the General Conditions, VoIP products and services have been shown to be innovative, reliable, resilient and customer friendly. The uptake of VoIP services both by consumers and in the business community has increased to such an extent that there is now a general acceptance amongst customers of VoIP telephony as a tried and tested, innovative, secure and reliable service. Ofcom's proposal not to discriminate against VoIP services and providers is recognition of VoIP as a mature yet innovative presence in the communications market and also that regulation should be technology neutral and not discriminatory towards a particular type of product or service.