



Internet Telephony Services Providers' Association

GigaTAG Call for Evidence Response

We are aware that the deadline for responses to the Call for Evidence is long since passed, however the work of the Gigabit Take-up Advisory Group was only brought to our attention very recently through one of our members.

As a representative of over 100 internet telephony service providers we feel that our collective input could be useful and hope that the brief comments that follow can be included in the project that is underway to encourage take-up of gigabit services.

About ITSPA

The Internet Telephony Services Providers' Association ("ITSPA") represents over 100 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.

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.

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

Summary of concerns

Cognisant of the figures showing limited take up of gigabit capable connections where they are fully available, it would seem fair to assume that there is a similar lack of zeal from potential users to drive the increase in availability of such connections too. It is clear that if the country is to achieve its targets in this area then the approach must be altered.

ITSPA members share the enthusiasm for the migration to gigabit capable broadband as it should realise many opportunities to carry our members 'over the top' products and services to more traditionally served consumers. However, it is our experience so far that the project as a whole is being managed in such a manner as to cause confusion for business and residential consumers, risks to service stability and availability as well as causing commercial uncertainty.

Lack of consumer awareness

Our primary concern at this stage is the lack of a national awareness campaign. With a suitably targeted campaign we could expect consumers to start asking questions of their providers and, thus encouraging providers to engage with the process of offering better solutions for users.

In turn, for those providers who are already engaging with the process, if there is greater awareness amongst consumers their communications are more likely to be understood and welcomed rather than treated as a simple sales tactic, or in some extremes a scam attempt.



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When you compare this project to the digital TV switchover there has been a vast difference in communication and effort made to educate consumers, which when you consider the impact of a failed communications network could have considerably higher consequences than losing a TV, is difficult to justify.

In the absence of a suitable campaign the transition to new services is an extremely difficult sell to the vast number of consumers who are content with their current service or those that cannot tolerate the risk that may be evident for existing services relying on their telephone system.

Lack of industry knowledge

At the time of writing we are still reviewing and responding on a number of Ofcom consultations that relate to the retirement of the copper network. One of our key points in the latest response is that Ofcom appear to be pressing ahead with decisions relating to regulation, or removal thereof, without any comprehension of how the project is progressing.

There are still a significant number of unanswered questions that are crucial to a successful migration, many of which we had hoped would be considered as part of the Openreach trials, however there has been very little feedback on that to wider industry.

ITSPA members have a number of concerns ranging from how an exchange area will be deemed suitable for copper to be withdrawn, how vulnerable users can be managed, net neutrality issues and the availability of repair and migration support.

All the time there is such uncertainty about the new gigabit capable products that are available and the migration process itself, it is no wonder that the sector are not promoting new services with gusto. It is the widely shared opinion of our members that there has been a somewhat 'back to front' approach and a far better strategy would be to establish the requirements, followed by the products to service the demand and finally work with industry on a migration plan that allowed for adequate testing and problem management.

Conclusion

In conclusion it is the opinion of our trade association that this project needs to be taken in hand by Ofcom or DCMS rather than allowing it to be led by Openreach in a way that suits them almost exclusively.

Our members wish to see an appropriate level of data and analysis resulting from Openreach trials to help inform next steps and once this has resulted in clear product options, adequate guidance and suitable regulation they will be better positioned to encourage consumers to migrate.

By increasing awareness for all types of users, this in turn will generate enthusiasm for change as well as helping our members engage with their current and potential new customers with a clear offer and a full understanding of any benefits or limitations in the service.