

IP Migration Briefing – March 2021

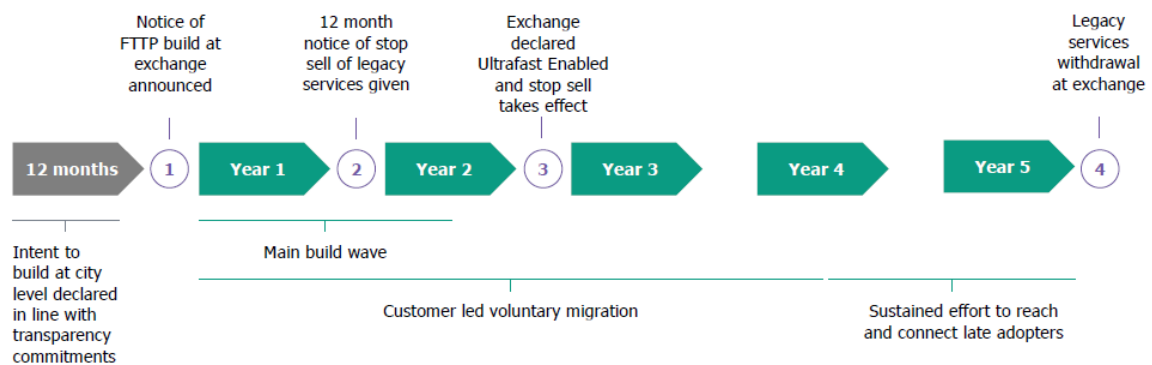
Since our previous briefing paper on this topic in January 2020 there has been a considerable amount of activity in the background to progress the project to shut down the PSTN and develop an all-IP network.

Ofcom’s oversight committee – the ‘All IP Steering Group’ - is reported into by a number of working groups chaired by the OTA and Openreach, and two of our council members regularly attend those Steering Group meetings to help us keep up to date with progress.

A reminder of what is happening

BT have announced their intention to shut down the PSTN in 2025 in favour of an all-IP network. This aligns with the wider government policy drive to implement nationwide ‘full fibre’ coverage by 2025.

Openreach have already communicated a number of stop-sell notices (meaning new copper orders, including upgrades such as additional ISDN channels on existing bearers can no longer be ordered¹) in areas where they have or soon will have sufficient fibre coverage to declare an area ‘full fibre’.



Salisbury and Mildenhall have been put on stop-sell as part of a trial giving them more flexibility in those areas but otherwise Openreach have to give 12 months notification of stop-sell of copper products, with a national stop-sell notification due in 2023, and then in 2025 all products will be withdrawn.

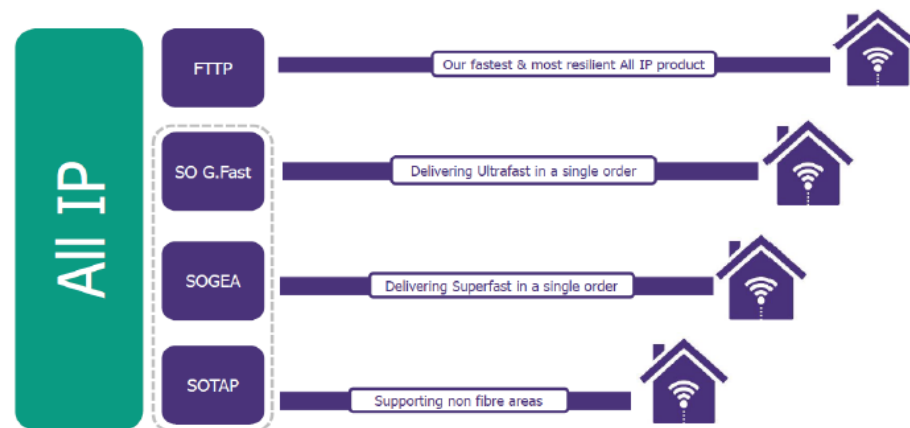
These stop-sell notices have already been issued in hundreds of exchanges, with the first big tranche taking effect in June, so the clock is ticking! A full list of the first 220 stop-sell notices which have been issued to exchanges is available [here](#).

Once an exchange has reached its stop-sell date you will only be able to order fibre-based products as shown below (note that Indirect Access and Carrier Pre-Select will cease to work on fibre and transitional

¹ This excludes the transitional products SOGEA and SOTAP.

products too), and this also means that if your customer moves premises or wishes to make a change to their service, they will have to migrate to a fibre (or transitional copper) product.

We have been assured that any faults on copper lines during this period will receive the usual levels of repair but we think it safer to anticipate that a major fault could result in special circumstances forcing early migration as this is already becoming apparent in some exchanges.



Outstanding concerns

There are several areas which Comms Council UK is continuing to explore and where we are still seeking further reassurances and decisions, these can be summarised as follows:

- Nationwide awareness campaign: We believe that there needs to be significantly greater awareness for business and residential users alike about the benefits and potential pitfalls of the migration. This is also essential to prevent double migrations whereby users upgrade to FTTC now through choice but will then be forced to FTTP within their contract period.
- Development of suitable replacement products: In areas where full fibre is not an option the current plan is to offer SOTAP, a product which is only available to LLU networks and will rely on the copper network and may not be able to offer a useable alternative to ISDN. In addition, it is important that residential users wanting simple voice only services have an affordable option. Much greater clarity is needed about alternative products and fallback solutions.
- Compatibility of consumer services: There are a significant number of services and products that rely on either the power source from the exchange or on copper-based technology which could cause serious concerns if they are not replicated in the all-IP environment. These range from personal alarms to public infrastructure projects.
- Net Neutrality: With many of our members providing OTT voice services it is imperative that there is free access across the variety of ISPs who will be providing residential and business services across the country.
- Battery back-up: There is a requirement to enable emergency calls during a power outage however there is still confusion over which parties are responsible for this and how it will be maintained. Without clear guidance we anticipate confusion and potentially life-threatening results.
- Reduced competition: With many WLR providers no longer being able to deal directly with Openreach, due to the requirement to install equipment in exchange buildings to serve fibre

customers, hundreds of direct providers will now be funnelled through a handful of wholesale providers. This is likely to create an environment with big brand networks having an advantage over the many and varied smaller providers to the detriment of choice, innovation and competition.

We urge all members to consider their own circumstances and the services they offer and bring anything not already included above to our attention so we can try to address it during our lobbying activity.

Regulatory Update

Comms Council UK has been busy over the last couple of years responding to all relevant consultations and engaging with MPs, government groups and consumer groups to ensure our sector is well represented. Below is a summary of key consultations over the last few months.

Copper retirement – process for determining when copper regulation can be removed

In June 2020 Ofcom published a consultation proposing to wait to consult on what premises could be excluded from the Openreach coverage until after the Wholesale Fixed Telecom Market Review statement had been published. Comms Council UK took the opportunity to respond that if they haven't got sufficient evidence already, then (noting that the wash-up from the trials still has not been performed) the other proposals should be put on hold as well until they have all the data needed. We raised a particular concern over how the figure of 75% has been reached to declare an exchange 'full fibre' and what that will consist of in terms of residential and business split. In addition, the removal of regulation on copper lines will leave Openreach with the ability to 'game' the system and profit unreasonably from this plan. We await a final statement.

Promoting investment and competition in fibre networks – WFTMR 2021-26

In November 2020 Ofcom published a consultation to which Comms Council UK (as ITSPA) responded with a number of concerns. Specifically, we raised concerns about the impact on legacy services (e.g., alarm systems, systems powered by exchange lines etc), net neutrality and the fact that business users are being all but ignored in this migration plan. We expect a statement from Ofcom in March.

Protecting voice only landline telephone customers

In January 2021 Ofcom published a consultation which sought to extend BT's voluntary commitment to cap price increases for voice only residential users, the statement has not yet been published but we expect this to be accepted and remain in place for 5 years. This is intended to afford some protection to the most vulnerable users to ensure they have an affordable voice solution regardless of technology changes. We expect a final statement from Ofcom in March.

GigaTAG report

Comms Council UK (as ITSPA) have also contributed to the GigaTAG review, a government initiated advisory panel consisting of representatives from Which?, the Confederation of British Industry and the Federation of Small Business. We are delighted to see in their interim report that our key concerns around the lack of national awareness campaign and confusion over replacement services have been reflected in their output.

As well as these reactive activities, Comms Council UK have been proactively reaching out to parliamentarians to have questions asked at select committees as well as directly to the Secretary of State. This, along with our ongoing bilateral engagement with Ofcom will hopefully increase the visibility of the concerns affecting our members.