



Internet Telephony Services Providers' Association

ITSPA response to Next Generation Networks : Responding to recent developments to protect consumers, promote effective competition and secure efficient investment

ITSPA welcomes the Ofcom consultation on *Next Generation Networks: Responding to recent developments to protect consumers, promote effective competition and secure efficient investment*. The transition to Next Generation Networks will provide numerous opportunities to the industry and consumers alike. ITSPA recognises that the process will take time and that there are a number of regulatory challenges ahead to ensure a fair and competitive telecommunications market is maintained. It is equally important for Britain's future that the appropriate investment decisions are made to ensure that the country can offer the same new services, which other countries are developing. In this consultation response, ITSPA has concentrated on the questions which are of most significance to its members.

Please note that the ITSPA response is not necessarily supported by all ITSPA members. Individual members may respond separately to this consultation.

Question 3: What additional technical standardisation work is required to support NGN deployment?

ITSPA agrees with the NICC that further technical standardisation is required, although it believes the overriding concern is that of delay. It would be better to agree initial good practice for interconnect and connectivity to allow 'standard' voice traffic whilst working on future standards to cater for the more advanced traffic. ITSPA would emphasise the need for Ofcom's continued oversight in relation to the development of replacement SMP products, as well as the continued provision of legacy SMP products, in order to prevent disputes arising. All BT NGN interconnect protocols & products should closely follow International Standards (including IETF & ETSI) and avoid country and/or vendor specific implementations, wherever possible. Where this is not possible, this must be fed back to the international standards bodies.

Question 4: What policy positions do you believe Ofcom ought to adopt in relation to interconnection between IP and TDM networks?

IP networks are now well established and many of our members have been operating them since the start of the decade. New entrants, in particular, deploy next generation networks and it is these companies that tend to represent the "long tail" of the industry. Some of our members have direct SIP interconnects with other NGN CPs. IP networks can no longer be described as "un-proven".

It is in consumers' best interests to move to all-IP networks as rapidly as possible, so that they can benefit from more efficient, lower cost technology and, eventually, use applications which require end-to-end IP functionality.

**ITSPA Secretariat
111 Buckingham Palace Road
London SW1W 0SR
020 7340 8737**



Internet Telephony Services Providers' Association

In terms of who should pay for the conversion, we believe that the originator should pay for any conversion that is required. Currently, BT charges for the conversion from IP to TDM –in IP Exchange, for example, the charges include an element to cover BT's costs of converting to TDM. So the originating IP operator is paying for the conversion to TDM. Conversely, we believe that an originating TDM operator should be obliged to bear the cost of any conversion that is required when handing a call to an IP operator. This may indeed have implications for the reciprocal charging regime.

TDM operators should be encouraged to move to IP in order that consumers and the digital economy can benefit from the applications that IP conveyance enables. It is important that all CPs should be encouraged to migrate to NGNs and IP interconnection as soon as possible so that consumers can benefit from end to end IP services and applications. Use of services such as video calls is currently inhibited by the requirement to convert to and from TDM and the difference in QoS functionality. It is also, therefore, vital that Ofcom encourages or obliges the industry to introduce more efficient, more direct routing of calls to ported numbers, for both fixed and mobile operators.

BT continues to use its TDM network not because the technology is unproven, but because of the difficulties it encountered with NGN deployment and migration. BT should be required to offer IP interconnect in addition to TDM interconnect, while it deploys its own NGN. Although BT already offers IP Exchange, this is basically a (unregulated) wholesale calls product (expensive compared to a regulated cost-plus) and not a regulated cost+ interconnect substitute suitable for network operators. We believe this should be required straight away.

The prevalence of SIP-I interconnect in particular should not be a factor in determining the point at which Ofcom regulates pricing on the basis of IP technology. SIP-I is a standard commonly used by legacy operators who are converting to IP. SIP-I is primarily used in order that ISDN traffic can be carried over IP networks. It is not necessary for the vast majority of voice traffic. Basic SIP interconnection is more common and is prevalent amongst new generation IP operators who are using IP-based versions of ISDN functionality. Basic SIP offers more flexibility than SIP-I.

Question 13: Do you think there is risk of terminal equipment incompatibility that warrants further SIP UNI standardisation? How should this be progressed?

This is a difficult problem to address as SIP is an evolutionary technology and there are significant differences between the various manufacturers of IP PBXs, although they are developing their products along broadly similar lines. The problem is not helped by the fact that the various suppliers of soft switches are developing new features along proprietary lines. This is more of an issue with SIP trunking than with SIP handsets. There are global standards such as SIPConnect from SIP Forum for IP-PBX sip interconnect, to address these issues.

Question 14: Do you have any other comments about compatibility of terminal equipment with NGNs and how they should be addressed?

It would be helpful if the industry could arrive at a standard, as was achieved with ISDN (although even this was encumbered by country-specific differences and the functionality on SIP

**ITSPA Secretariat
111 Buckingham Palace Road
London SW1W 0SR
020 7340 8737**



Internet Telephony Services Providers' Association

is greater than that on ISDN). One solution could be a basic level of SIP standards which would be mandatory and then higher levels which would be voluntary. Those manufacturers and suppliers who invest in R&D to develop features etc to work at an agreed higher standard would be rewarded with a higher level of sales. This would also avoid the need to carry out interoperability testing with all soft switch and other equipment suppliers.

About ITSPA:

The Internet Telephony Services Providers' Association (ITSPA) is the UK VoIP industry's trade body, representing 60 UK businesses involved with the supply of VoIP services to industry and residential customers within the UK. ITSPA pays close attention to the development of VoIP regulatory frameworks on a worldwide basis in order to ensure that the UK internet telephony industry is as competitive as it can be within international markets.

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

**ITSPA Secretariat
111 Buckingham Palace Road
London SW1W 0SR
020 7340 8737**