

Proposed guidance on protecting access to emergency organisations where there is a power cut at the customer's premises

Proposals for guidance on General Condition A3.2(b)

The four proposed 'principles':

- CPs should have at least one solution that enables access to emergency organisations for a minimum of one hour in the event of a power outage in the premises
- The solution should be suitable for customers' needs and should be offered free of charge to those who are at risk as they are dependent on their landline
- CPs should i) take steps to identify at risk customers and ii) engage in effective communications to ensure all customers understand the risk and eligibility criteria and can request the protection solution
- CPs should have a process to ensure that customers who move to a new house or whose circumstances change in some other way are aware of the risk and protection solution available.

Do you agree with the four proposed principles? If not, please give reasons. Please set out your comments on each of the principles separately.

The retirement of the PSTN and associated network elements is a natural progression as it reaches the end of its life and the technology becomes increasingly obsolete and prohibitively expensive to maintain. In parallel, providers are rolling out full fibre networks in line with Government's ambitions for these Gigabit networks to reach 15m premises by 2025 and voice services will be delivered over broadband to these customers. Mobile indoor coverage for all operators is now at 92%¹ and the vast majority of customers would use their mobile rather than their landline to contact the emergency services in the event of a power cut at their property. As customers are increasingly choosing IP

¹ <https://www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-update-spring-2018>

technology and its benefits of being faster and cheaper and more suitable for the converged digital world of today, the key concern now is how to ensure that this migration is a smooth process and that the regulatory obligations that served in a PSTN world, don't block or de-rail the transition to an all-IP one. Developing a proportionate approach will be vital to ensure full fibre roll-out is not delayed or impeded.

The benefits of all-IP aren't limited to its superior digital capabilities but that the technology also has the potential to hasten the closing of the digital divide. Moving the currently offline onto all-IP, even if the customer chooses to limit their initial use to making 'Voice over Internet Protocol' calls only, is in fact getting the customer half way towards being online in a broader sense. For the 8% of the UK population who have never been online, this could make a very important step in their journey. As such, we welcome Ofcom's current consultation to ensure that customers remain protected in the event of a power outage placing emergency calls.

BSG sponsors welcome Ofcom's decision to provide clarity in setting out expectations on meeting the GC requirements. We would however caution against guidance that may be overly prescriptive in its demands and instead allow CPs the ability to innovate in how they are able to satisfy the overall GC. CP's for example may allow customers to self-determine whether they would be considered vulnerable or at-risk. An overload of information for a new customer requesting an all-IP service risks information fatigue and confusion. Addressing on an individual basis which customers also own a mobile phone, if the indoor coverage is satisfactory, which customers might need protection that extends beyond the one hour mandated, which customers might have greater need of the protection and are therefore entitled to have the solution provided free, and so on, could prove rather onerous for the CP and burdensome for the customer.

Ofcom is right to not mandate a solution and allow CPs the flexibility to provide the measure that they deem best suited – whether that be battery back-up or mobile back-up.

The BSG is keen to maintain engagement with Ofcom on this issue and work towards finding solutions and ensure that CPs remain well informed and clearly guided on fulfilling the obligations as the industry moves towards an all-IP future.