



Vodafone Response to Ofcom Consultation: Proposed guidance on protecting access to emergency organisations when there is a power cut at the customer's premises

Summary

As the UK prepares for a fibre future and seeks to encourage investment in public voice and data communications networks it is timely for Ofcom to review applicable regulations. Over the last decade we have moved from an environment where broadband has moved from 'nice to have where affordable' to, for many, a 'can't live without' tool for gaming, carrying out personal chores and multimedia delivery. The fixed phone line is fast becoming a secondary tool behind mobiles for personal calls and communications.

As technology has moved on and user behaviour has changed it is right that this is reflected in regulations.

We therefore support in principle Ofcom's proposed updated guidance on the interpretation of, what will be GCA3.2b, however have a number of suggestions on the wording to improve clarity and understanding.

General Condition A3.2(b)

Ofcom is consulting on guidance to, what is currently GC3.2c, and in autumn 2018 will become GCA3.2(b). For all intent and purpose these two obligations are the same albeit with slightly different language. As Ofcom has done, we will refer to the future GCA3.2b in this paper. Ofcom sets out four obligations in its proposed guidance to GCA3.2(b):

- *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 landlines*
- *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.*

We support the introduction of Ofcom's new guidance to the interpretation of GCA3.2b, it makes sense when thought of in the context of PATS customers who do not already benefit from network based resiliency to their service.

However, where the PATS service already benefits from network based resilience (such as traditional copper based TDM voice networks with exchange based powering and power backup), the third and fourth bullets become *unnecessary*. The customer already benefits from a solution, provided often without their knowledge, there is therefore no need for the CP to identify at risk customers, engage them or take account of house moves etc.



We would therefore suggest that the guidance is amended slightly so that between bullets 2 and 3 are inserted the words “Where the customer does not enjoy the benefits of a network based solution” or “where the requirement is fulfilled by a solution external to the primary network” – and then bullets 3 and 4 would apply.

This then ensures that the guidance applies to all technology solutions and network designs both where there are (existing) networks with network based power back up and (newer) networks where power back up solutions need to be applied on a case by case basis at the customers’ site.

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