

ACS

Telecommunication Consultants

**Response to CICRA Consultation 12/52
Initial Notice on Wholesale Line Rental Product**

November 2012

Introduction

Wholesale Line Rental (WLR) is a product that has been available in other jurisdictions for many years and was originally implemented on copper lines. In many cases it has been augmented or superseded by Local Loop Unbundling (LLU) and/or Broadband Only products including configurable xDSL products. As a consequence of its configuration it can be considered as a legacy product and is likely to have limited utility in view of the imminent changes in technology.

Response to the Consultation

General Comments

One of the key advantages of WLR is the ability of new entrants to manage their customers through a single bill, thus increasing the brand image and making management of the customer simpler.

As proposed WLR will only be introduced on standard lines, with the promise of the addition of ISDN services at a later date. The reasoning cited in the consultation is that the implementation of this product may be more complex to provision. ACS finds this difficult to understand since the majority of the network and administration elements will be the same for both products. The absence of WLR ISDN products will, in the view of ACS, be detrimental to competition and limit the appeal of the WLR products to other operators.

The consultation also provides no clarity as to what call products will be included with WLR. Nor does it give any indication of pricing or bulk call usage discounts. While the consultation outlines the administration processes, it is unclear as to the charging applied for these services. Furthermore there is also no clarity on the level of maintenance charging that will be applied during inter-operator fault location. Without this information it is difficult to determine the value of the product to other operators.

ACS also observes that there is also a key element of WLR missing from the current proposal, that of Carrier Pre-Selection (CPS). CPS is different from the currently available product of Carrier Selection which has been implemented in both Jersey and Guernsey. CPS automatically routes all traffic originating on a WLR line to the network of the other operator without the need for routing digits. This would also enable other advanced services to be managed by the other operator without incurring further administration costs.

CPS is a feature that has been implemented on legacy System X switches in the UK and ACS sees no reason why this product should not be easily introduced onto Next Generation (NGN) IP based switches. There would also appear to be no good reason to delay such implementation because of the different stages of switch development across the islands.

While ACS broadly welcomes this addition to the telecommunications wholesale portfolio, it is disappointed to note that there is no mention of including more modern options in the licence addition.

It must be accepted, in light of the current network development being undertaken by JT, that in Jersey at least, the WLR option has a limited lifetime and that new technologies will be coming on stream in the near future.

ACS would wish to see reference to Session Initiated Protocol (SIP) as this is now implemented on most private telephone switches (PBXs) and is already being deployed in other jurisdictions. In order to fully open up the wholesale market, business services must be included in any wholesale offer. It would appear to be a backward step to introduce ISDN WLR since this requires additional emulation on an NGN switching system. Nevertheless, failing the early introduction of broadband only or SIP products, ISDN is a necessary fallback measure to ensure adequate competition on business lines.

Furthermore, in order to open up the market to further competition, Fixed Number Portability (FNP) should also be pursued by the regulator. This would enable real competition as coupled with SIP FNP would enable PBX connected consumers to take services via any provider using a SIP interface.

Since Mobile Number Portability was introduced into the islands using a centralized database system, there should be no technical impediment to introducing FNP into the islands, save the implementation of a suitable administrative process. FNP would also open the market to other network platforms and introduce more competition into the overall telecommunications market.

Comment on the Proposed Licence Condition 17.10

The proposed amendment to the licence by the addition of this condition appears to be very narrow as it deals only with WLR. In the view of ACS the amendment to the licence should be much broader and should encompass other possible wholesale options that are likely to be included in the future, such as broadband only and shared access over fibre.

It is the opinion of ACS that an extension to this condition should be included so that additional services (as outlined above) could be added as and when they become available. By extending the scope of this condition, there would therefore be no delay in bringing new wholesale services on stream.

ACS further suggests that the condition should specify the inclusion of ISDN and CPS in order that these features are introduced without further administrative delay.

ACS Telecommunications Consultants
40 Maison St Louis
St Saviour
JE2 7LX

www.acsjersey.com

admin@acsjersey.com