



Voice Line Access (VLA)

Consultation Response Summary Document

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1. Executive Summary

The responses recorded and described in this document have been received in response to the Openreach Voice Line Access Consultation Document dated 4th April 2007.

The VLA proposition is made up of number of key components which would enable CPs to construct a telephone service with a distinctive service/feature wrap.

VLA would only available through the BT 21st Century Network and in its initial phases would be applicable only to Analogue exchange lines. It is proposed that if Openreach proceeds with VLA, an Analogue VLA service would become available during 2008 and if provided, the ISDN service may follow approximately a year later.

CPs were requested to return responses to the main consultation and a separate common consultation covering VLA and WBCB technical features. The revised consultation timelines were as follows:

- Deadline for responses on Consultation Doc 27th July 2007
- Re-issue product Con Doc / CP Responses Register 10th August 2007
- Consultation closure document published 24th August 2007

The proposed product high level business requirements for this consultation are available at/from the VLA page on the Openreach website or by clicking [here](#).

The common consultation, Technical features of VLA and voice aspects only of WBCB (Consult21 consultation C21-LA-003), and response form is available from the Consult21 website or by clicking [here](#).

Openreach has seen a good level of interest from Communications Providers (CPs) and industry bodies, receiving twelve formal responses to the consultation on Voice Line Access (VLA).

The principal views on the product generally were as follows:

- Respondents generally welcomed Openreach's plans to develop a VLA type product but Openreach should consider the impact on other products
- The product should be available in line with the roll-out of the 21CN network but Openreach should ensure that development should not commence prior to agreeing a product specification that meets the needs of industry as a whole or in advance of the publication of necessary protocol standards
- Volume forecasts indicated that growth could be comparable to the current market for WLR with CPS and potentially further growth in areas where it is not feasible for CPs to deploy an LLU based service as well as, if the product design permitted, opportunity for a service similar to that supported by a naked DSL/generic access line product. However many CPs stated that reliable volumes could not be provided without visibility of indicative commercial pricing.
- VLA should be available on a national basis
- In general it was felt that it is not necessary for VLA to support the provision of CPS.
- Respondents were particularly interested in the ownership of the VLA product within BT Group and the majority of respondents would prefer a single supplier of all the components necessary to deliver a service based on the VLA product
- The product specification and ownership needs to ensure simple migration between different BT Group products
- A number of respondents indicated that they would be interested in bilateral meetings to discuss their views further

As a result of the consultation response and feedback from industry through the Consult21 Line Access Group, Openreach aims to conduct a feasibility study which will reconsider VLA high level requirements and possible development options.

2. Introduction

VLA would be offered to all CP Customers on the same Equivalence of Inputs (EOI) terms and conditions utilising only defined interfaces and processes.

The end-user product offering would be an Analogue line supplied on an approved Openreach termination point (NTP). This product could be used to build either single or multiple line installations but the configuration of a line and any auxiliary lines would reside in the CP's call server.

The product would rely upon the availability of network infrastructure over which to pass the resulting Internet Protocol (IP) traffic. Components of this infrastructure would lie outside of the VLA product and may be used in common with other interconnected services e.g. Multi-Service Interconnect Links (MSIL). These components would be supplied by BT Wholesale or other parts of BT Group directly to the CP Customer.

The ordering and fault reporting interface for the product would be between Openreach and its CP Customers, and would utilise the Openreach Equivalence Management Platform (EMP).

The product processes would support;

- Product Establishment
- Service fulfilment; new supply and transfers
- Service assurance
- Service Modification
- Cessation
- Complaints

The CP Customer placing the VLA line order could be independent from the CP which operates the interconnected network infrastructure and/or Call Server functionality. This separation of function echoes the market structure of the WLR/CPS industry and facilitates service migrations.

The consultation provided the opportunity for CPs and industry bodies to submit comments on the proposed product by an extended deadline of 27th July 2007. Twelve responses were received from CPs and industry bodies.

Openreach aims to conduct an extended feasibility study and will continue to consult with CPs through the Consult21 line access working group and arrange bi-lateral meetings where requested. Once these activities are concluded Openreach will publish a full consultation closure document.

The consultation asked for responses to the following questions:

Q1. Given the range of products currently available in the market and planned developments, do you consider the potential development of a VLA product attractive? YES /NO if you answered YES, please explain your reasons.

Q2. Do you consider this is an appropriate juncture for development of such a service?

Q3. To assist with any potential product development decisions, please provide an indicative 5 year volume forecast for VLA down in the following manner:

- VLA forecast on a yearly basis split by residential/business (basic/premium)
- Views on its availability in different geographic regions.
- Assumptions made and how those might affect the forecasts provided

Q4. CPS and VLA. VLA is seen by many as the replacement for WLR/CPS offerings and therefore CPS on a VLA line is effectively incompatible.

- Should an EU or a CP wishing to use CPS on a VLA line automatically be reverted back to a WLR line?
- What EU / CP authority should be required to make this access line change as a result of a call routing change?

Q5. Do you consider that Openreach should be the sole provider of all the VLA components or should BT Wholesale supply the components appropriate to 21CN network interconnection?

Q6. What is your preferred charging mechanism and pricing structure for the various VLA components and how should these charges scale with end user volume, usage volume and geographic scale?

Q7. Are there other issues you have identified that may need to be considered by Openreach?

This document records sample comments and questions from CPs to illustrate the range of views that Openreach received on the product. These comments are for information only at this stage, but will be taken into account by Openreach as part of further detailed definition/specification of the product.

Note – The proposals for the product outlined in this Consultation Summary Report represent Openreach’s current view, which may be subject to further change.

3. Responses from Respondents (with Openreach views)

3.1. General Comments on VLA and the Consultation Process

CPs were invited to comment on the consultation process itself as well as the proposed VLA product proposal.

3.1.1. CP Response Summary:

Eight respondents provided some general feedback on VLA and 2 of those had some comments on the consultation process.

In general the development of a VLA type product was welcomed with comments such as “considers VLA as a natural development in opening the BT network to provide CPs with control and capability to meet our Business Voice customers needs” and “welcomes the development of Voice Line Access which we believe will promote choice and competition by providing communications providers with the tools to develop new and innovative services and service bundles”. There were both positive and negative comments regarding the effectiveness and timeliness of the consultation process. One respondent stated that they felt the process had taken too long and delays related to standards work should have been anticipated and that Openreach should have contributed more to the Consult21Line Access Working Group. Another respondent stated that the consultation has been well managed and consultation with industry has been open and pro-active.

3.1.2. Openreach Comment (considering CP views)

Openreach considers that the response to the consultation was substantial and provides a number of well considered views from CPs and industry bodies that will assist in defining the potential scope and nature of a product that best meets industry needs. Although the product concept was welcomed in general Openreach also acknowledges that an extended feasibility study needs to consider the impact on the LLU, WLR and Converged Access markets.

3.2. VLA Product

Q1. Given the range of products currently available in the market and planned developments, do you consider the potential development of a VLA product attractive? YES /NO if you answered YES, please explain your reasons.

3.2.1. CP Response Summary:

Nine respondents indicated clearly that development of a VLA product was attractive. Two respondents clearly indicated that it was not. One respondent indicated that the concept was attractive but only if it allowed CPs to address areas where MPF was not viable. The respondent also expressed concerns about the potential impact of VLA on LLU CPs and possible interaction between VLA and LLU.

3.2.2. Openreach Comment (considering CP views):

In response to these views, Openreach considers that the the VLA concept has the potential to be both commercially and operationally attractive to CPs addressing a number of different markets based on comments such as "a potential successor for WLR which offers improved flexibility and scope for innovation and so will be attractive to communications providers active in this market", "would allow a CP to find a complementary strategy to its LLU deployment" and "significant opportunity to develop niche and novel products and services by using the VLA product concept...not ... offered by the 20CN network and the current WLR and CPS products". However the responses contained mixed views and some positive responses were heavily qualified.

Openreach also recognises the issues raised around the sensitivity of the pricing of the product, multiple supplier relationships, migrations between products and the requirement for smaller CPs to be able to buy VLA directly from Openreach and use this in conjunction with rented partitions on third parties' call servers.

3.3. Product Timing

Q2. Do you consider this is an appropriate juncture for development of such a service?

3.3.1. CP Response Summary:

Six respondents indicated clearly that they considered that this was an appropriate juncture for the development of a VLA product. Three respondents indicated clearly that this was not an appropriate time to develop a VLA product. Three respondents indicated that the product development should not be rushed or should be delayed until standards are mature.

3.3.2. Openreach Comment (considering CP views):

Although consensus is that development should continue in line with the roll-out of BT's 21st Century Network Openreach is minded to ensure that development should not commence against a product specification that will not best meet the needs of industry as a whole, or at a pace too far in advance of the publication of necessary protocol standards. Openreach aims to do an additional feasibility study that will focus in part on OSS development options and timescales.

3.4. VLA Volume Forecast

Q3. To assist with any potential product development decisions, please provide an indicative 5 year volume forecast for VLA down in the following manner:

- VLA forecast on a yearly basis split by residential/business (basic/premium)
- Views on its availability in different geographic regions
- Assumptions made and how those might affect the forecasts provided

3.4.1. CP Response Summary:

Five respondents were able to provide some estimate of volumes. There were mixed views regarding whether these would represent mainly business lines or residential lines but the responses suggest that Openreach could expect at least a certain volume of WLR lines with CPS to be migrated gradually to VLA with/following the roll-out of 21CN. Other respondents did not provide volumes primarily due to the difficulty to do so without commercial/pricing information to base their decisions on.

Regarding geographic availability, five respondents clearly stated that national coverage is required. One respondent stated that its focus would be in LLU areas only.

3.4.2. Openreach Comment (considering CP views):

Volume forecasts indicate that growth could be comparable to the current market for WLR with CPS and potentially further growth in areas where it is not feasible for CPs to deploy an LLU based service as well as, if the product design permitted, opportunity for a service similar to that supported by a naked DSL/generic access line product. However many CPs stated that reliable volumes could not be provided without visibility of indicative commercial pricing. Openreach notes the need for the product to address the needs of CPs addressing both business and residential markets (the latter supporting the requirement for a voice and broadband convergence capability).

Openreach is currently aiming to provide indicative pricing towards the end of the year and is mindful of the requirements for pricing to reflect the requirement for national availability of the product. Openreach will also seek to explore the effect of pricing on volumes through industry consultation and bilateral discussions with CPs.

3.5. CPS and VLA

Q4. CPS and VLA. VLA is seen by many as the replacement for WLR/CPS offerings and therefore CPS on a VLA line is effectively incompatible.

- Should an End-User or a CP wishing to use CPS on a VLA line automatically be reverted back to a WLR line?
- What End-User / CP authority should be required to make this access line change as a result of a call routing change?

3.5.1. CP Response Summary:

Most respondents who answered the question preferred to express their views on whether CPS should be allowed on a VLA line rather than on the automatic reversion to WLR and authorisation issues. Seven respondents indicated that it should not be possible to order CPS on a VLA line or that CPs should be able to choose whether or not to allow CPS on their VLA lines. Two of these seven respondents stated that the exception would be where a CP has an SMP condition requiring it to offer CPS to all customers using its lines.

3.5.2. Openreach Comment (considering CP views):

Openreach proposes not to include a CPS set-up capability in the day 1 requirements for VLA. However by definition onward call routing is outside the scope of this product as currently specified. The application of CPS principles requires further study and is subject to further discussions with industry and Ofcom.

3.6. VLA Provider

Q5. Do you consider that Openreach should be the sole provider of all the VLA components or should BT Wholesale supply the components appropriate to 21CN network interconnection?

3.6.1. CP Response Summary:

There were mixed responses but most respondents indicated a preference for a single supplier. Four respondents indicated a preference for this to be BT Wholesale. Two respondents indicated a preference for this to be Openreach. Two respondents stated an interest in a supplier arrangement supported by an alternative product construct/proposal which is expected to be consulted upon in the near future through the Consult21 Line Access Working Group.

3.6.2. Openreach Comment (considering CP views):

Openreach acknowledge that respondents were particularly interested in the ownership of the VLA product within BT Group and the majority of respondents would prefer a single supplier of all the components necessary to deliver a service based on the VLA product. Openreach also note the underlying requirement for consolidated interfaces and transparent process as demonstrated by comments such as "existing issues raised through demarcation of ownership when CPS/WLR customers have a line fault should not be able to be repeated under VLA" and "We are happy that the service components be provided by different suppliers as long as services from

both can be requested through a common interface". Openreach will continue to work with the Consult21 line access working group to explore this further and indeed Openreach aim to evaluate development options in a future feasibility study.

3.7. VLA Pricing Structure

Q6. What is your preferred charging mechanism and pricing structure for the various VLA components and how should these charges scale with end user volume, usage volume and geographic scale? (See section 11 of the consultation document)

3.7.1. CP Response Summary:

Two respondents stated the proposed pricing structure was acceptable. Three respondents offered alternative constructs. Four others provided comments on specific aspects of the pricing structure.

3.7.2. Openreach Comment (considering CP views):

In response to these views, Openreach currently aims to provide indicative pricing towards the end of the year and is mindful of the requirements for pricing to reflect the reach of a CP's network and a nationally delivered product.

3.8. Other Issues

Q7. Are there other issues you have identified that may need to be considered by Openreach?

3.8.1. CP Response Summary:

A number of respondents commented on the importance of simple migrations between other products offered by BT Wholesale and Openreach including requests for common points of handover.

3.8.2. Openreach Comment (considering CP views):

The product specification and ownership needs to ensure simple migration between different BT Group products. Openreach also recognises that there is a requirement for the product to address number portability issues.

4. Q&A

The following questions were raised within formal CP responses.

Q. VLA and CPS – "Does this not fall under the purview of the Migrations Policy Board?"

A. The Migrations Policy Board (OTA sub group) may have a view on the application of CPS to VLA lines and whether this should result in reversion to a WLR line. Openreach cannot answer this.

Q. We would like to know if BT Wholesale will allow large corporates to co-locate Call Servers in the network to manage large, closed, private voice networks?

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A. Yes a product is available from BT Wholesale to support this but this will be on commercial terms with BT Wholesale.

Q. Can call servers deliver centrex functionality?

A. Yes - call servers can deliver centrex type functionality but they will need to be specified to do so. This would be the CP's responsibility.

Q. What will be the cost of conveying calls between two points on a private network? Is there a per minute charge or does the Call Server owner just ensure that they own fat enough interconnect pipes with BT Wholesale?

A. This has not been defined at this time.

Q. Are there any guidelines as to what rental charges will be?

A. Openreach is currently aiming to publish indicative pricing towards the end of the year (December 2007)

5. Timescales & Next Steps

Following the publication of this Consultation Summary Report, Openreach proposes to progress the VLA product as follows:

| Action | Indicative Target Date |
|--|--|
| Openreach to start product definition for the Product | June 2007 (ongoing) |
| Potential Feasibility Study to consider OSS design and process options. | September 2007 |
| Bi-lateral discussions | September 2007 |
| Openreach to share product definitions and solution specifications, when available, with CPs expressing interest in trialling the product. | Ongoing (but planned to be iterative throughout the definition phase of the product) |
| Indicative product prices published | December 2007 |
| Further dialogue between Openreach, Industry and other stakeholders | Ongoing |
| Product Trials with participating committed CPs. | Q1, 2008 |
| Launch Product | Q3, 2008 |

Note – The proposals for the product outlined in this Consultation Summary Report, including the above timelines, represent Openreach’s current view, which may be subject to further change. Changes to dates will be communicated through the Consult21 Line Access working group and through normal Openreach briefings.