Guernsey Airtel response to GCRA's Call For Information titled 'Fibre to the premises – Future approach to emergency calls' dated 30 July 2021

Via Email to info@gcra.gg

With reference to the questions listed in your Call for Information titled Fibre to the premises – Future approach to emergency calls' dated 30 July 2021, please find our answers, in blue, against the questions.

As you envisaged in the document, we are unable to answer some of the questions, as they pertain to areas of different expertise from others. We have made comments accordingly against such questions.

Overall, with respect to the question of providing uninterrupted emergency call access for the FTTP customers, our views are as below.

i) We believe the case in point is about ensuring uninterrupted power supply to the premises. Though the Call for Information deals with emergency calls, a similar case would be applicable to other systems like life supporting equipment, alarm systems, Lift access to the premises etc. We believe this should be primarily be the responsibility of Guernsey electricity to ensure uninterrupted power supply to the premises of vulnerable persons and wherever required to provide necessary back up systems to ensure uninterrupted power supply.
ii) We also firmly believe that a mobile connection would not be the appropriate solution, as the mobile indoor penetration vary greatly depending on the type of construction of buildings and the location within the house where the caller is located. Since an emergency call solution require a robust solution, a power back up would be the right approach. We have established further arguments in this respect in detail, against the relevant questions below.
iii) Irrespective of the approach, we also firmly believe that the well being of the vulnerable persons is the responsibility of the government and, hence, the cost of such remedies should be borne by the government.

Q1) Is it appropriate for a vulnerable group to receive a free back-up solution from the telecommunications provider/operator on the conversion to FTTP and should they have this solution periodically replaced for free by the operator/provider? Please provide your reasons for this (which may include social, economic and other policy reasons).
It is the government's responsibility to take care of the vulnerable. As it pertains to the availability of uninterrupted power, Guernsey Electricity need to be made responsible to ensure uninterrupted power supply and where applicable to provide back up solutions with required financial support from the government.

Q2) Which of the above qualification tests (Emergency Service Reliance, Landline Reliance or particular Combination approach) or any other should be adopted to determine whether a household is vulnerable and qualifies for a free power back-up solution? Please detail why your chosen solution is the most appropriate (you may wish to consider its social, economic and technological desirability, effects or its costs and ease of administration).
This should be decided as per government guidelines.

Q3) Should all lift, fire and burglar alarm lines be provided with free power back-up systems or should this depend on whether the household ultimately served is within Emergency Service Reliance, Landline Reliance or a particular Combination approach?
In our view, each of these items play into emergency scenario one way or another, hence should be looked at collectively.

Q4) Should the above qualification tests be applied to each person in the household (as suggested above) or only to the landline subscriber and, in the former case, how best should one determine/define what should constitute a household for these purposes?

These should be decided by the government as per their guidelines.

Q5) Should business premises and subscribers using the service for the conduct of a business, be excluded from the above free back-up solutions and, if so:

- ❖ Is there any particular class of subscriber conducting a business from residential premises who should still enjoy these free solutions?
- ❖ Should business lift, fire and burglar alarms enjoy these free solutions?

This should depend on the government guidelines set out in answers to above questions.

Q6) What has been the frequency, duration, cause and location of power outages in Guernsey in the last five years?
Guernsey Electricity may be contacted for the historic data

Q7) Which areas of Guernsey (if any) are more affected by power outages, to what extent and why?
Guernsey Electricity may be contacted for the historic data

Q8) Are there foreseeable/predictable, if exceptional, events that may cause longer than normal outages, and if so, what are these events and what length of power outages would they be likely to cause?
Guernsey Electricity may be contacted for the relevant data

Q9) Does the mobile communications network have the capacity to handle the increased call volumes during an outage, where consumers have all migrated to an FTTP system (and there is no PSTN)? Please provide details of relevant capacities, expected increase in call volumes and your calculations in regard to the above.
Airtel mobile network is able to handle the current emergency call volume. Airtel does not have visibility of emergency calls on PSTN, hence unable to estimate the expected call volume or comment.

Q10) If the capacity of the mobile network is exceeded by calls placed during an outage, to what extent and with what degree of certainty, can emergency calls still be identified, prioritized and connected?
Emergency calls are identified by the B party numbers and routed accordingly. The routing principle will remain the same unless advised differently.

Q11) In what specific areas of Guernsey is there mobile reception that would be sufficiently poor to risk 999 call failures or prevent adequate communication on any connected call?
As the emergency calls discussed here are originated from indoors (since it is considered as a back up for landline during power outage), indoor coverage need to be considered. As a technology mobile networks are built based on coverage predictions and the performance indoors could vary based on type of construction, how deep inside is the customer is etc. As the above factors vary from building to building, there is no sure shot way to predict the ability to make emergency calls successfully from all locations within the buildings.

Q12) To what extent are all poor reception areas known and well documented or, if not, able to be easily and accurately determined (and, if so, how is this determinable)? How large is the number of potentially affected households?
Please see answer to question 13.

Q13) For what period could the mobile network be expected to function (on reserve battery power) in an ongoing outage, where there is only a FTTP system (and no PSTN)and factoring in any expected increase in mobile usage during such an outage? (Please show relevant calculations, expected call loads and consequent duration of back-up power sources to mobile masts etc)
Mobile sites are designed to operate with battery back up of [✂].

Q14) What are the installation costs of and the relevant specifications, size and bulk costs of BBU units able to deliver 1, 4, and 8 hours of standby power (and what talk time would each deliver)?
BBU vendors would be in a better position to answer this question.

Q15) What are the relevant specifications and bulk costs of PAYG mobile phones (without SIM cards) able to provide 1, 4, and 8 hours of standby power (and what length of talk time would each deliver)?
PAYG mobile phones are not at all the right solution for this due to reasons below.

i) In the case of a vulnerable person in an emergency, assuming the person is accustomed to using a land line for emergency calls, there should not be a situation where the person in emergency need to make a decision on which service to use. It should be seamless and s/he should be able to use the service s/he is accustomed to.
ii) Due to the reasons mentioned about the indoor coverage challenges related to mobile signals, mobile can not be a fully dependable emergency call alternative to PSTN indoors.
iii) If the customer is a regular land line user, s/he may not be accustomed to ensuring that the stand by mobile phone is always in a state of charge and ready to use.

Q16) With due regard to the above and any other relevant factors you describe, for what minimum period of time should any back-up solution provide the ability to make emergency calls?
We believe this should be established by Guernsey Electricity based on historic outage information and forward looking views on supply resilience.

Q17) Where both solutions (BBU and PAYG mobile) are available, which is superior/preferable? Please detail why.
We believe BBU should be the way forward. We propose BBU on multiple counts against Mobile solution, as below,

i) In the case of a vulnerable person in an emergency, assuming the person is accustomed to using a land line for emergency calls, there should not be a situation where the person in emergency need to make a decision on which service to use. It should be seamless and s/he should be able to use the service s/he is accustomed to
ii) Owing to the reasons mentioned about the indoor coverage challenges related to mobile signals, mobile can not be a fully dependable emergency call alternative to PSTN indoors.
iii) We believe back up battery unit is the right way to go ,as this will kick off the back up in case of an outage seamlessly without any intervention from the customer.
iv) If the customer is a regular land line user, s/he may not be accustomed to ensuring that the stand by mobile phone is always in a state of charge and ready to use.

Q18) Are there particular subscribers for which either a BBU or PAYG mobile would be an unsuitable solution, given any relevant factors (including technical competence to operate, charge and maintain)? Please detail who these would be and why.
Unsuitability of mobile solution is explained in previous answers. As to the BBU, it is relatively better option, however , even BBU could go faulty without notice , thus rendering the service unavailable.

Q19) In the circumstances outlined above, do you have any information that might indicate the level of demand for paid BBU installation, the financial viability/profitability of such a BBU installation business (particularly for a telecommunications operator) and likely pricing levels? If so, please provide the same.
We are unable to comment

Q20) Should an operator be legally required to install a BBU unit for a subscriber that requests it and is willing to pay for it?
No. Customer need to connect with the power company to get this installation done.

Q21) If network operators do provide BBU installation to subscribers converting to FTTP, to what extent does an operator enjoy a position of market power to raise BBU pricing above a competitive level?
In our view , this is an electrical work required to ensure uninterrupted power supply to the premises which may power the FTTP in addition to others like alarm systems, lifts, life supporting equipment etc. Hence this should not be a part of the operator responsibility but that of the Guernsey Electricity, ensuring continuous supply and ensure remedial measures to cater for an outage for vulnerable individuals.

Q22) Would it be proportionate for the GCRA regulate the pricing of telecommunications operators for installing a BBU, in order to prevent any abuse of market power in BBU installation (such as unreasonably high prices) and to ensure an affordable price and, if so, on what basis should such regulation proceed?
Please see answers to Q 21.

Q23) To what extent should the network operator be required to: independently price its BBU installation and not bundle the same, not design its FTTP in a fashion that unreasonably restricts compatibility with third party BBUs, provide reasonable logistical and technical cooperation to third party BBU installers and inform customers of their right to have their BBU installed by an independent installer.
Please see answers to Q 21.

Q24) What subscriber and household data do network operators hold from which they may be able to determine/deduce: (i) Emergency Service Reliance or (ii) Landline Reliance (and how would this be done)?
Landline operators may be better positioned to answer, we do not offer this service.

Q25) What subscriber and household data could operators obtain from retail broadband providers or other sources that would allow them to deduce (i) Emergency Service Reliance or (ii) Landline Reliance (and how would this be done)?
Broadband operators may be better positioned to answer, we do not offer this service. [GCRA Comment: This information was accurate at time of this submission, but Operator indicates it now does offer these services]

Q26) To what extent would network operators be dependent on subscribers providing the information necessary to determine their (I) Emergency Service Reliance or (ii) Landline Reliance.
Government should determine, based on their guidelines.

Q27) To what extent, in what circumstances and how would a network operator be likely to migrate subscribers, en masse and/or without consent, to an FTTP system?
We are unable to answer as we do not offer these services. [GCRA Comment: This information was accurate at time of this submission, but Operator indicates it now does offer these services]

Q28) How and at what stage of an FTTP migration process, especially an involuntary migration, would the operator be able to:

- ❖ provide information to transitioning subscribers as to the requirements to be able to claim vulnerable status and the process for doing so?;
- ❖ obtain the information necessary to determine a subscriber's Emergency Service Reliance or Landline Reliance and then implement any solution?
- ❖ determine a non-vulnerable subscriber's desire to purchase a BBU and then install it?
- ❖ explain the risks of FTTP (especially in power outages) and for the subscriber to opt out of any migration (if the PSTN remains)?
- ❖ explain the operation, testing and maintenance of any back-up solution supplied/installed?

We are unable to answer as we do not operate these services. [GCRA Comment: This information was accurate at time of this submission, but Operator indicates it now does offer these services]

Q29) On what time-scale should (i) PAYG mobiles and (ii) BBU units be replaced to ensure reliable operation and appropriate back-up duration?
We believe a stand by mobile option is impractical for the reasons established in answers to previous questions. As to the BBU unit, the BBU supplier would be able to provide answers.

Q30) Should network operators be required to replace PAYG mobiles/BBUs at the end of their effective life, if they become faulty or malfunction and what would be the projected costs of imposing this duty on operators?
As we explained, PAYG is not the right solution. Ref BBU, the power company would be in a better position to answer this questions.

Q31) What testing may be required of BBUs or PAYG mobiles to ensure they are still functioning normally and reliably on an ongoing basis (and what testing equipment can be supplied with the solution to enable this to be done easily by laymen)?
BBU- BBU supplier can suggest.
PAYG – regularly keeping it charged , keeping it on and making test calls periodically.

Q32) Should the duty to test for reliable functioning of the solution be imposed on vulnerable subscribers or on operators (and what would be the costs of imposing this on operators)? Please provide full reasoning and costing.
The responsibility should lie with the user or the carer at site in case of mobile phone.
BBU supplier should be able to answer regarding the maintenance requirement of BBU.

Q33) Which, if any, particular categories of vulnerable subscribers would not be capable of doing any testing of back-up devices (whether BBU or PAYG mobile) and would it, in any such case, be more appropriate to impose this duty on the operator?
We are unable to comment

Q34) Should a network operator be required to monitor whether a subscriber has become vulnerable and is entitled to the relevant back-up protections, and if so, in what fashion and how regularly should it conduct such monitoring?
This should be managed by the government based on the government's policies and guidelines to establish vulnerability.

Q35) Should a network operator be required to investigate and respond to a change of a vulnerable subscriber's address (which might require protective measures at a new site) or their switching to a new FTTP provider (who might need to be informed of his/her vulnerable status)?
Please see answer to Q 34

Q36) Comment on any matters relevant to a potential dispute resolution process that may need to be put in place, including the:
- ❖ Obligation to provide documentation or evidence (and what this should be) in order for a household to establish a proper claim to vulnerable status;
- ❖ Operator complaint/claim procedures to process and resolve subscriber claims for vulnerable status;
- ❖ Time limits and milestones for the processing and resolution of claims by operators;
- ❖ Obligations by operators to provide written reasons to claimants for any decision to refuse their claim;

This should depend on the government's approach to the solution.

I hope this answers your questions satisfactorily. In case any further clarification is required, please contact us.

Guernsey Airtel Limited
24th September 2021