

GFL/JS - 91 851
October 28th, 1991

**Comments from CIGREF
related to Analysis Report on the application
of ONP to voice telephony**

1- GENERAL COMMENTS

The steering committee in Telecommunications of CIGREF fully supports the three basic goals for voice telephony as drawn up in the preface of the analysis report i.e. right of users, open access to network infrastructure, planning and coordination of European numbering.

The definition of voice telephony service is difficult with respect to the following points :

- ⇒ Historical confusion between the network circuit switched infrastructure and the voice telephony itself.
- ⇒ Ability of the same infrastructure to bear voice telephony services and in addition other different services.
- ⇒ Multiplicity of different kinds of network infrastructures able to bear voice telephony.
- ⇒ Related regulations which are not the same in the different member states.

Having regard to their needs and considering that the analysis report does not indicate how they would be completed, it appears to the users of CIGREF that it is necessary to fully consider voice telephony as a service and hereby to consider the relations with each different bearer service that could provide voice telephony services.

So, the document, despite the definitions given in Annex 1, ought to make a clear distinction between :

- ⇒ Network infrastructure and
- ⇒ Bearer services (e.g. circuit switching, virtual switching, I(S)DN, radiocommunications bearer services, satellite bearer services, ...),
- ⇒ Voice telephony services (supplied by a single or inter working set of convenient bearer services) and other bearer services based on other (new) technologies (frame relay, cell relay, ATM, ...

From us, such an approach by defining clearly each bearer service in relation to voice telephony would avoid that the ONP applied to the voice telephony could merge the elements strictly related to the voice telephony service with part or all elements supporting any other bearer service, for example elements of the analogue circuit bearer services.

The main goal is to consider voice telephony services as a whole where the interworking is transparent to the user.

Such an objective cannot be reached if the bearer services on which telephony services stand are not harmonised themselves on both regulatory and technical levels.

Therefore, in our understanding, future Directives ought to take into account the following considerations :

- ⇒ Whatever are the economical and political solutions adopted to solve the problems of cross subsidiation, of distinction between the basic bearer providers and value added service providers (in particular TOs providing competitive services : They have to be included in the user category), of functional or technical harmonisation between partners, e.g., it is to be reminded that users want to pay for what they use and that it is necessary to make a clear distinction between costs related to civil service and other costs. This is why the cross subsidiation or the technical advantages the bearer service providers could get from their positions have to be very clearly stated.

Competitive services can be supplied by using bearer services under reserved or exclusive rights or not, where voice telephony basic services have their own regulatory rules. Today such a situation leads to the economical problem of civil service, which liability remains on the ability for everyone to use some of the offered services. This implies geographical whole coverage at national level where commercial value added services and others (based on bearer services under exclusive or special rights or on common infrastructures) can be obtained far from the need of a civil service.

- ⇒ The new features having to be defined rather by the pressure of the market than by the regulatory process.
- ⇒ The new features having to be linked with the basic ones without distortion among the different member states.
- ⇒ The ONP having to provide a real harmonisation between member states accepting one or more carriers.
- ⇒ The ONP having to provide a real harmonisation between member states accepting different definitions of bearer services and of the frontiers between services.

Notwithstanding the previous comments, the main goals to be achieved in the future application of ONP to voice telephony should be :

- ⇒ European harmonisation (or standardization) and completion of tones, prompts, basic services, commands, command codes,
- ⇒ European harmonization of the numbering plans,
- ⇒ Personal identification number provided at European level. This service should be based both on fixed bearer services or on mobile bearer services.
- ⇒ Clear definition of voice telephony services that ought to be provided by every convenient bearer service, including radiocommunication bearer services.
- ⇒ European standardization of the payment cards, credit cards or personal codes being used on call boxes or from any NTP when connected to a convenient terminal.
- ⇒ Tariff harmonization.

2. DETAILED COMMENTS

Those detailed comments address the contents of the analysis report itself so they do not prejudice our general comments. Therefore we do not make the distinction here, as the analysis report does not make it either, between the different bearer services and the contents of voice telephony services.

Chapter 2 – & 2.3 – page 2

We suggest to add a third item in which it would be stated that the NRA must report to the Commission of the results of activities mentioned in items 1 and 2.

Chapter 2 – & 2.4 – page 3

In the first item we suggest to add to the two first cases giving rights to compensation a third one about service degradation.

Chapter 3 – & 3.2 – page 4

As far as users are concerned by user demand they wonder how such a demand is expressed ?

Chapter 4 – & 4.1 – page 5

In the item 2 we understand that to "access charges" mentioned in the last sentence are related to infrastructure and not services normally provided, that means they concern initial and connection access charge.

Chapter 4 – & 4.2 – page 6

We suggest to add a fourth item in which it would be stated that "cross border services provided ought to be published".

Chapter 5 – & 5.1 – page 7

- ⇒ In the item 1.b) the "periodic rental charge" has to take into account in one hand the access specialization (outgoing, incoming, ...) in other hand the geographic coverage. From us it would be interesting to have the choice between a permanent or a call by call charge. We understand that calls for which users are invoiced are only successful ones.

⇒ We suggest to add the two following principles :

In the first one, it must be stated that changes in tariffs had to be known three months before their enforcement, and may be a lawful cause of contract breaking,

In the second one, it must be stated that a successful call between two countries has to be invoiced at the same price whatever the invoicing country is, and the type of the NTPs involved in the communication are.

No tariff elements other than listed in b. must be used.

Chapter 5 - & 5.2 - page 8

Concerning cost accounting system, we feel that such a system must be clear and unambiguous. For this reasons in each country all the parameters should be the same, the computation process should be the same. Only the values can change from one country to an another.

Users can agree with derogations if the date of their termination is clearly indicated.

The universal availability of public service is not a reason for charging extra costs.

We think, in order to ensure consistency of the cost accounting system, that a european independant body would be created.

Chapter 5 - & 5.4 - page 10

Instead of the beginning of the sentence "National regulatory authorities may agree reduced special tanffs ..." we would prefer the following : "National regulatory authorities *must* agree *reduced* special tanffs".

Chapter 6 - page 11

About billing, we suggest to add the beginning and termination date of different optional or additional features choosen by the user.

Chapter 7 - page 12

We suggest that :

- ⇒ Directories of telephone suscnbers ought to be real time updated on electronic form, one time a year in printed form, both at no additional cost.
- ⇒ The availability of directory information by TOs must be public and consistent with the directive on Protection of personal data an privacy in the context of public digital telecommunications networks.
- ⇒ The TOs must offer directories with DDI numbers, where available.

Chapter 8 – & 8.1 – page 13

Everywhere it is needed, any kind of organization dealing with the public should be able to operate their own interface standardised call boxes.

Chapter 8 – & 8.2 – page 13

We think it is necessary to add that credit cards may be used as well as telephone pre-payment cards.

Chapter 8 – & 8.3 – pages 13 and 14

About item 2, the fact to emphasize "in railway stations, airports, etc." may appear as contradictory with contents of paragraph 8.1.

We suggest to take into account the telepoint services.

Chapter 10 – page 15

In item 2 we suggest to delete the end "wherever technically and economically feasible", or to describe the conditions of possible derogations.

More generally, the text ought to foreseen terminal equipment mobility from one location to an other in describing the socket, the electrical conditions and the signalling protocol presented at the NTP.

Chapter 11 – & 11.1 – page 15

- ⇒ In item 1 we suggest to re-write the second sentence as follows: "A telecommunications organization must not discriminate between the allocation of attractive numbers to its own services and to services provided by others".
- ⇒ Therefore, the users must gain, free of charge and in a non discriminatory way, the attractive numbers they want as far as it is technically feasible.
- ⇒ About item 3 we suggest that the notice of number changes would be given 6 months before its enforcement.

Chapter 11 – & 11.2 – page 16

Concerning item 3 (portable numbering schemes) we think it is necessary to clearly define portability and its scope, member state by member state on a pan European basis.

In the same way, it seems important to explicit the first sentence of the item 4: "unique individual numbers with pan European significance".

Chapter 12 – page 18

We do not understand the reason why ONP is concerned with non-payment of bills, so we suggest to delete sentences related with this idea. For other infringements, it is important to put emphasis on the harmonization of measures ensuring due warning given to users before service is interrupted.

Chapter 13 – page 19

We do not agree with the implementation of national standards or specifications. So, we suggest to add a recommendation to constrain supplier to replace the national standards or specifications as soon as a European or an International standard is available.

Chapter 16 – page 21

The appeal procedure rules have to be published by each member state.

Chapter 18 – page 24

User representatives and service provider representatives must be consulted by the Commission to provide the right technical adjustments the market would need.

ANNEX 1

It is possible to underline the following points :

- ⇒ The need to make a clear distinction between additional and competitive services mentioned as advanced features.
- ⇒ The need to qualify voice telephony as a reserved service or not for each of following cases :
 - . NTP simple interface
 - . NTP complex interface covering signalling exchanges with other networks or NTPs.
- ⇒ The need to enumerate the elements of voice telephony service available at the NTP.
- ⇒ The need to remind the definitions of "Bearer service" and "Service access point" (SAP).

ANNEX 2

Chapter 1 - & 1.1 - page 27

We suggest to add in the first sentence **"and protocols"** after **"technical characteristics of interfaces"**.

- ⇒ For analogue networks in a), because they are single line multiwire interface, to write : **"single line interface"**. We think that the text must give the capability for those using su-addressing scheme to keep it.
- ⇒ For ISDN in f), in state of the existing wording we suggest to write the following **"details of audio-bearer and unrestricted bearer services offered"**. The air interfaces must also be mentioned in the text.

Chapter 1 - & 1.3 - page 28

In tariffs must clearly appear the distinction between National and International prices by type of service (e.g. audio-bearer service, unrestricted bearer service).

Chapter 1 - & 1.7

Recourse and conciliations procedures must be added.

Chapter 2 - page 28

The definition of terms licensing conditions and customer is needed.

ANNEX 3 – page 30

Concerning the items **"fault rate per connection"**, **"fault repair time"**, **"call failure rates"**, if it is of a great importance to count up them, it is also essential to clearly define these faults and the technical means applied to detect them in an unambiguous way.

About transmission quality it is necessary to make distinction between different geographic levels (local, regional, national, european, international).

In fact this annex creates an interesting but difficult problem : the definition of calls of reference leading to a fair harmonization.

ANNEX 4 - pages 31 and 32

In item 1 we suggest to add to the listed facilities the "*call waiting*". Therefore it is necessary for a more efficient use of voice telephony in Europe to have an unique pan european set of tones. In particular a distinction has to be made between the different non successfull calls : no response, network busy, network failure, suscriber busy.

In item 2 we suggest to put voice mail in subjects to further study.

To improve the use of telephone service in all EC and EFTA countries it would be of great benefit to define a strong harmonization of the service command codes as far as the harmonization of numbering plans allows it.



CLUB INFORMATIQUE DES GRANDES ENTREPRISES FRANÇAISES

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*Comments from CIGREF on proposal for a Council Directive
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The CIGREF in its comments related to Analysis report on the application of ONP to voice telephony has clearly brought out its full support of the report's objectives i.e. right of users, open access to network infrastructure, planning and coordination of an European numbering plans.

Therefore, CIGREF has stressed the importance, to achieve a real and efficient set of European voice telephony services, of following issues :

- . Clear definition of voice telephony services that ought to be provided by every convenient bearer service, including radiocommunications bearer services.
- . European harmonisation (or standardisation) and completion of tones, prompts basical services, commands, command codes.
- . European harmonisation of the numbering plans.
- . Personal identification number provided at European level (for fixed and mobile services).
- . European standardisation of the payment cards, credit cards or personal codes being used on call boxes or from any NTP where connected to a convenient terminal.
- . Tariffs harmonisation.

So the CIGREF notes with concern the way the Directive is developing. We specially regret the withdrawal of features for public pay telephone for use in selected locations and related common features, even if they may be considered of less importance.

.../...

But, we consider as extremely regrettable the lack of ambitions concerning European numbering issues which was, from us, of major importance in such an essential directive.

At least, the withdrawal or weakening of the following issues seems to confirm the backward movement of the initial scope of this directive, especially in the sense of European harmonisation :

- . Description of rights to compensation if the contracted quality levels are not met.
- . Contents of itemised billings.
- . Periodicity of directories publication.
- . Specific facilities for handicapped users and people with special needs.
- . Process of numbering changes etc.
- . Common specifications for network access including the socket.
- . Etc.

So, users are wondering if they will have to face an unified or a fragmented European voice telephony set of services.

In short, the CIGREF which has supported the contents of the document ONP COM 91-43 considers, nevertheless, that the previously mentionned points have to be taken into consideration.

Best regards.


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