

Comments on Next Generation Broadband in Ireland Discussion Document by Comreg

The Voice on the Net (VON) Coalition Europe (hereafter “VON Europe”) hereby wishes to share with Comreg its comments on the Discussion Document on Next Generation Broadband in Ireland (hereafter “the Discussion Document”).

VON Europe’s comments can be summarized as follows:

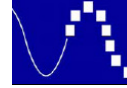
1. NGB must also consider the dimension of numbering in an all-IP, cross-border context and Comreg should adapt its approach to numbering to ensure there is full access by service providers to all the ranges available, regardless of the nomadicity or not of the application or service used, or the technology.
2. Mobile and fixed access operators should be prohibited from restricting access for their end users to VoIP services and applications, be it through the use of discriminatory practices (in terms of operational access and end-user tariffs) or even simply through the blocking or degrading of VoIP services or applications on either their network or the devices connecting to their network, regardless of the numbering range allocated to those services;
3. Comreg should preserve the derived demand for NGB created by the innovative services and applications made available over broadband, often at no or little cost.

We thank you in advance for taking consideration of these views. Feel free to contact Caroline De Cock, Executive Director VON Europe, by phone (+ 32 (0)474 840515) or email (cdc@voneurope.eu) should you need further information.

ABOUT the VON Coalition Europe

The Voice on the Net (VON) Coalition Europe was launched in December 2007 by seven leading Internet communications and technology companies, on the cutting edge – iBasis, Intel, Google, Microsoft, Rebtel, Skype and Voxbone – to create an authoritative voice for the Internet-enabled communications industry.

The VON Coalition Europe notably focuses on educating and informing policymakers in the European Union in order to promote responsible government policies that enable innovation and the many benefits that Internet voice innovations can deliver. More information can be found on www.voneurope.eu



I. Access to Numbers

The focus on Next Generation networks/ Next Generation Broadband always seems to miss a crucial element, namely “**Next Generation Numbers**”.

VON Europe strongly believes that in order to fully reap the benefits from the innovation and potential of the applications and services using the VoIP protocol, numbers, including geographic numbers, should be eligible to be allocated to any provider or user and to be used by end users outside of the traditional telephone zones or other boundaries, including on a trans-national basis.

VON Europe therefore believes that Comreg should put in place a framework in terms of numbering that rests on the following principles:

- All VoIP providers and users (fixed or nomadic) have a full and unconditional access to both geographic and non-geographic numbers in order to enable new innovative services and applications to be offered to businesses and consumers;
- Access by service providers to numbers from the Irish numbering plan should be unrestricted cross-border, as is the case in countries such as Denmark, Estonia, and the UK amongst others, to the benefit of thousands of consumers and businesses.

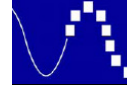
II. NGB and consumer choice

Ensuring that users can obtain and use the services, application, content, and devices of their choice without restrictions, is critical to unlocking the vast potential of the Internet. Applications like VoIP are particularly sensitive to degradations in network performance and because of their peer-to-peer nature in some cases, can be faced with various network management impediments by access operators.

Broadband should be seen as unfettered data access, and not defined solely on the basis of data rates. Regardless of what a supplied transfer rate may be chosen to fall under the broadband heading, limitations of the total amount of data consumption makes any value of the definition of transfer rate a moot point. Especially, due to the fact that basic data itself is rapidly becoming larger and more complex.

Data limits hamper emerging technologies that use the availability of broadband to deliver this content to the consumers. High definition streamed media, automatic program updates, online data storage, virtual work-spaces, etc. are becoming more prevalent and the companies that will be providing these services are being held back by data availability to the public.

Speeds need to be effective enough as to not be a detriment to the quality of their service and latency is also an important factor to consider. Packet shaping and data transfer management



should not arbitrarily hamper data in anyway. This leads to inequality in service for the consumers and will damage the companies that provide these services over broadband.

It is not the how, but the what, that is broadband. It is the ability to consume the information provided as it is meant to be on the technologies that are currently available. Merely having access is not significant enough to be defined as broadband. As many services have to have a watered down experience provided to those with access that is hampered by technological limitations. So, as technologies progress so should the definition of broadband.

III. Demand-driven growth must be preserved by Comreg

VON Europe fully agrees with Comreg's remark that *"Notwithstanding the existence of an NGB network, (...) consumers will not necessarily use it unless they see a compelling need to do so. This need typically manifests itself in the desire to use a key service or application which requires NGB (a derived demand)"* (pg. 42).

Preserving the derived demand for NGB created by the innovative services and applications made available over broadband, often at no or little cost, is crucial, and we do consider that Comreg puts it in jeopardy when stating *"there may be a role for risk sharing both between communications firms but also with companies that expect to benefit from the ability to sell their services directly to consumers over NGB networks"*(pg. 45).

Comreg certainly needs to explain what it implies with this statement, as it may be interpreted as entailing a tiered Internet and an end to the current "best efforts" model in place.

VON Europe considers that it is the range and diversity of applications, services and content made accessible over the Internet often at no or little cost that is the main if not the only driver for the demand by consumers of higher bandwidths. This model has also made it possible for SMEs across the world to offer their services and products to the world, merely by putting a website online that was equally accessible by all users across the world.

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