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Sent: Monday, 27 August 2007 12:56 p.m.
To: TSO Review; dcunliffe@ministers.govt.nz
Subject: Telecommunications Service Obligation (TSO) regulatory framework

Hello,
Reading the documents, before making a submission, I find them to be lacking in details, and Telecom are already making claims.

This from thw Ministry web site:
DC: ["This is a 'first principles review'," said Mr Cunliffe. "However, fundamental aspects of residential local telephone service, such as access to emergency calling and a free local calling option, will continue."]

There is NO mention of FAX machines anywhere - surely they have not been overlooked ?
but Telecom seems to be thinking differently, and issues conflicting statements.
<http://www.stuff.co.nz/4178345a28.html>

Telecom: ["Existing wiring and phone sockets will not have to be replaced and mains-powered phones such as cordless phones will still work, but conventional analogue home phones will not."] That statement does not make sense. Cordless phones have the same analog interface electronics as a modern DTMF wired phone.
Or do they mean the very old Dial Pulse phones ?

comment: DTMF wired phone technology is globally universal, so claims like

Telecom: ["It is a viable option if you intend to keep an analogue switched platform permanently, and we do not. The problem we have got, which is somewhat unique compared to other countries, is that our PSTN does not get manufactured parts any more, so we have to get rid of the entire thing.]

Hard to believe, or does he mean Dial-Pulse Phone technology, and then they try to use that as a leverage-excuse to ALSO RETIRE DTMF phones ?
(which are globally standard)

Telecom: ["What we are proposing is to deliver all voice calls over voice-over-IP, which implies a powered device in the home."]

Hmm - Now THAT is a BIG jump, and that is NOT Line compatible with a domestic Cordless phone. Hard to know what they really mean.

Suggestions:

I believe the vague discussion document needs to be made MUCH CLEARER on the actual operational aspects

** FAX machines should be included - these need FAX modem infrastructure.

** Distinctions should be made between DTMF, and Dial-Pulse phones, and different methods of ring generation, as well as just WHAT line-powered capability is being changed/removed.
Even Telecom seem to contradict themselves above!

** Domestic Cordless Phones use an Analog Line interface, loop current, and ringing. So non-powered Phone support is also possible

** It is technically feasible to offer line-powered phones, that will continue to work in emergency / mains outage situations.

** large sections of rural NZ will NOT be able to have VoIP, so will need access to line powered phones (as well as Dial-Up modems, and fax modem services).

It is foolish to create a two-tiered design, based purely on fitting more of the newest (most profitable) technology into city cabinets.

It is also foolish to move to a LESS reliable system, with higher outages than POTS. VoIP and cellular systems have more outage modes. eg some Cellular internet plans, have specific "Might not work in rain" clauses - and heavy rain, is just when you might NEED emergency services.

The Xtra bubble fiasco is enough of a reminder of how NOT to manage infrastructure changes!

regards
Jim Granville,
B.E. (Hons)

References: Modern Silicon DAA Phone Chips:

http://www.silabs.com/public/documents/tpub_doc/dsheet/Wireline/Silicon_DAA/en/si306x.pdf

Search here for "New Zealand" to see the Chip industry support for NZ Phone systems. (contrary to Telecom's somewhat self-interested claims)