



European Office of Crafts, Trades and Small and Medium-sized Enterprises for Standardisation
Bureau Européen de l'Artisanat et des Petites et Moyennes Entreprises pour la Normalisation
Europäisches Büro des Handwerks und der Klein- und Mittelbetriebe für die Normung

NORMAPME & PIN-SME POSITION PAPER ON THE TELECOMMUNICATION PACKAGE

Telecommunications, and in general ICT, play a crucial role in daily activities of all European SME. Outlining the increasing usage of ICT amongst SMEs, NORMAPME¹ and PIN-SME² welcome the European Communication proposals on telecommunication that reviews 5 telecom directives, the decision on the radio spectrum and the recommendation defining markets subject to ex-ante monitoring from the national telecom regulators. The telecommunication package can be seen to some extent as a step forward towards a better understanding of end-users' needs. Nevertheless some points remain problematic:

- Only consumers benefit from a protection increase,
- A level of quality of service and speech is neither guaranteed neither properly apprehended,
- Interconnection Issue and
- "Outdated" reference" to ETSI deliverables.

1) Extension of the scope of protected stakeholders

Although we welcome the initiative to better protect consumers, we regret that other types of users with limited ICT knowledge and negotiation power vis-à-vis large telecommunication stakeholders meeting similar difficulties do not benefit of the protection granted to consumers. For instance, the needs of Small and Medium-sized Enterprises are similar to a great extent to the ones of consumers.

SMEs need to be protected when dealing with their telecommunication providers.

2) Definitions of Quality level and Quality of services

a) We are aware that due to the migration from circuit-switched towards packet-switched technology Voice over Internet Protocol (VoIP) telephony is constantly increasing compared to traditional telephony services like ISDN or analogue access telephony. Since this legacy telephony services were offered via a telephone network designed and operated through strict transmission plans there was a guaranteed quality allowing exchange of intelligible speech in real-time. The VoIP services offered today do not have guaranteed quality levels as they are transported via IP networks with best effort transmission performance. There are no generally agreed transmission plans for VoIP comparable to legacy telephone services. Therefore there is no automatically provided minimum quality level of

¹ NORMAPME is the European Office of Crafts, Trades and SMEs for Standardisation and represents in 31 countries more than 12 million enterprises, which employ around 50 million people.

² PIN-SME, the PanEuropean ICT and eBusiness Network for SMEs, is the first European association of the ICT sector exclusively focused of representing the interests of SME. PIN-SME represents more than 50.000 enterprises, which employ around 200.000 people across Europe.

VoIP so that the user can not be sure that a voice communication will work. Hence, it should be stated directly and without misunderstandings in the definition of the “publicly available telephone service” in Article 2 of the Universal Service Directive that it is a service allowing exchange of intelligible speech in real-time.. Otherwise a “call” would be nothing else than a term for describing the situation that there is communication between end-users (via a network). In addition, since the current electronic communications are handled via multiple networks, this quality decrease problem will affect not only fixed telephony but also mobile telephony as next “GSM/UMTS” standards are to be based on packet-switched technology and thus will also use VoIP.

b) Now, the user has only the guarantee to a connection to the publicly available network. This connection (and only the connection) must be capable of supporting voice, facsimile and data communications. For the transmission performance within the network and via interconnected networks there is no similar minimum objective. Thus an end user cannot be sure - even if his/her connection is in working order - that he is able to establish connection to other end users who are supporting e.g. voice communication. In the present and future telephony sectors, quality problems are generated more and more by low quality of transport layers and less and less by poor signaling. National Regulatory Authorities should ensure that operators provide good transport classes.

c) Quality of services should be better taken into consideration. After rushing to the cheapest telecom services, European users discovered that the QoS delivered is often not what they expected. The increase in complaints brought by the users to their user organizations depends on the countries. In countries where IP (Internet Protocol) services have a significant development and when relevant figures are available (Belgium, France, ..), the complaint growth since 2004 rose dramatically to reach around 100% for IP services. The analysis of these complaints reveals that most users' concerns are about aspects like helpdesk, contract or billing issues while close to 30% of their concerns are related to the technical quality of the service. All consultancy companies having experience in bill checking, agree that the error level they are used to find in their surveys ranges between 7 to 12% of the bills.

Cost control measures are already in place regarding the universal service provision, but they must be extended to include mobile telephony. We would also have liked to see provisions limiting contractual lock-in in order to provide more flexibility for end-users when they want to change operators.

Especially in the light on of the increasing use of IP telephony, European users believe that a greater emphasis should be brought to QoS and therefore any kind of voice communication should comply to the same specifications, whatever the type of network it is provided (Universal Service).

SMEs need to have good telecommunication services at a reasonable price – This package could ensure it.

3) Interconnection Issue

One of the present specificities of the present VoIP telephony market is the lack of proper interconnection. Now a subscriber to a VoIP operator, like Skype, can only phone to a counterpart having subscribed to the same operator. This problem is not sufficiently well tackled in the package. Interconnection should be better enforced in order not to force the user to investigate to which operator his/her counterpart has subscribed prior calling him/her. This can be very burdensome for small enterprises.

Without need for investigation, SMEs need reach and to be reached their customers and/or suppliers whatever the operator they use.

5) Outdated reference to standards

In Annex III there are still references to outdated standards, like ETSI EG 201 769 and some more recent deliverables. This guide (ETSI EG 201 769) is outdated since it is focused on voice telephony only and on legacy circuit-switched telephone networks. In the presently in force List of Standards of the EC there are by far more better standards listed that are more up-to-date and that are covering more services (e.g. EG 202 009, EG 202 057 and G.1010).