

17th September 2010

Mr. David Stone
Telecommunications Carriers' Forum
Building C
14-22 Triton Drive
Albany
AUCKLAND 0632

Subject: Amdocs' submission for the draft standards for Ultra Fast Broadband in New Zealand

Dear Mr Stone,

Amdocs would like to make the following submission to the Telecommunications Carriers' Forum consultation on the draft standards for Ultra Fast Broadband. As a future business and technology solutions provider within the high speed broadband market for New Zealand, Amdocs support the Telecommunications Carrier's Forum in the introduction of these standards.

Amdocs is a large multinational business providing telecommunications focused business and technology services. We are market leaders in solutions and services for enabling OSS and BSS with over 18,000 telecommunications experts in over 60 countries worldwide. Amdocs is heavily involved across the telecommunications industry in Australia and is currently widening its footprint in New Zealand.

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After reviewing the draft standards, Amdocs have three areas of commentary, regarding:

- Responsibilities must be defined for optimal initial installation and problem handling
- Future proofing for ultra fast broadband
- Layer 1 definition

Amdocs' detailed submission for the above three comments are as follows:

1. Responsibilities must be defined for optimal initial installation and problem handling

End user experience is paramount to the success of Ultra Fast Broadband, in both the initial installation and ability to provide effective service assurance. As a customer for Fibre to the Premise (FTTP), installation typically consists of an ONT with lead in to the network, connected to in premises wiring to outlet points; the responsibilities for these parts of the network must be clearly defined so that the initial installation is handled correctly and problems can be diagnosed and isolated to the relevant part of the network and therefore to the correct party for resolution.

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The installation process will optimally be streamlined, effective and error free. Retail service providers emphasise that any requirement for multiple appointments will result in dissatisfaction and the view from field operators is that multiple appointments with multiple technicians makes clear, on the spot installation problem resolution impossible. Hence, the goal must be for a single installation appointment with preferably a single technician or contractor, even where components belonging to both the Local Fibre Companies and Access Seeker must be installed. To achieve this, commercial arrangements should facilitate sharing of workforce in some way. Operational processes should organise the separate tasks to be performed in a single truck roll.

Additionally, service assurance must be simple and effective. Typically, the retailer will receive any fault reports. The combined OSS capabilities of the Access Seeker and Local Fibre Companies should support as much diagnosis as possible during the initial customer contact. This requires access to relevant information in the Local Fibre Companies' systems by the Access Seeker, keeping in mind the need for common interaction processes across the Local Fibre Companies. A combination of OAM standards such as IEEE 802.1ag and trouble ticket interactions such as those described by Comms Alliance, NICC or OSS/J¹ would provide suitable standard service assurance processes.

2. Future proofing for Ultra Fast Broadband

- Provision for future network upgrades should be considered as part of the original design of Ultra Fast Broadband. Standardisation of inputs for OSS/BSS systems should be defined and maintained to ensure continued compatibility across the network.
- Amdocs note the evolving nature of high speed Ethernet technologies and standards.
- For the edge network (OLT), the next PON technologies are emerging: 10G TDM PON, 4A GPON could be superseded by WDM-PON, each new technology does still utilise the PON topology, but can also define new and different product offers.

Amdocs would advise that the wholesale providers should guarantee a minimum set of public product definitions that will continue to be supported by any new technology that can be rolled out in the future.

The choice of the MEF 6.1 standard as the basis of the Ultra Fast Broadband would represent a good network independent definition of Ethernet services.

3. Layer 1 definition

Amdocs note a mention from the Government that both Layer 1 and Layer 2 wholesale services will be provided. A definition of Layer 1 should be provided. A layer 1 service (dark fibre) requires a point to point connection; in the case of PON architecture it is important to maintain an equivalence of inputs across all regions:

¹ JSR91 – OSS/J Trouble Ticket API, <http://jcp.org/en/jsr/detail?id=91>

- The different splitters between the co-location site and the delivery point should provide a certain level of cross connect capability to be able to build an end to end point to point connection.
- The number of fibres between the co-location site and first splitter and between the first splitter and any second or third splitter should be sufficient.

Amdocs look forward to the future of Ultra Fast Broadband in New Zealand and would like to continue to support the Telecommunications Carriers' Forum. Amdocs can be contacted locally through our representative Angie Judge by mobile on 64 21 186 9321 or via email at angie.judge@amdocs.com.

Yours sincerely,



Ananda Subbiah
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(pp Angie Judge, Principal Consultant New Zealand)