



Commission for
Communications Regulation

Information Notice

Modification of CLFMP to allow EVDSL: Call for responses from Industry

Information Notice

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An Coimisiún um Rialáil Cumarsáide

Commission for Communications Regulation

Abbey Court Irish Life Centre Lower Abbey Street Dublin 1 Ireland

Telephone +353 1 804 9600 Fax +353 1 804 9680 Email info@comreg.ie Web www.comreg.ie

Additional Information

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1 Modification of the CLFMP to allow EVDSL

1. Eircom has proposed a modification to the CLFMP (Copper Loop Frequency Management Plan) to allow Exchange launched EVDSL (Exchange launched Very High Speed DSL) Services. Currently VDSL services can only be launched from the street cabinet i.e. CVDSL (Cabinet launched Very High Speed DSL).
2. It first proposed this change to industry in November 2013 under the auspices of the ComReg chaired NGA (Next Generation Access) Forum, where Eircom presented the results of its laboratory tests on the effects of EVDSL on CVDSL services.
3. There has been an ongoing dialogue and substantial work undertaken with Industry on this proposal: bilaterally between various operators and Eircom, at the NGA Forum and at specially convened technical meetings of the CLFMP Working Group (this group is convened by ComReg on an ad-hoc basis to consider in depth the technical aspects of any proposed change to the CLFMP).
4. This work has also incorporated a live trial on the Eircom network, open to all operators, which commenced on 20th May 2014 with the first live customers on 23rd May, at four locations throughout the country: Dooradoyle Co. Limerick, Monaghan Town; Skerries Co. Dublin and Westport Co. Mayo.
5. Initial results of this trial have been available to operators since 6th June 2014 and have been updated on a weekly basis since. This Eircom trial is ongoing with a number of operators taking part and remains open for additional operators to participate.
6. ComReg is calling for all interested operators to submit the results of their analyses and corresponding interpretation of the output of this trial and the laboratory tests completed to date, specifically in relation to the proposal under consideration: to allow the current cabinet based VDSL services to be launched from the exchange or Central Office.
7. In light of the ongoing consideration of the proposed CLFMP change, where operators have plans, submissions should include operator plans for EVDSL deployments. Operators should include documentary evidence of these plans such as business plans incorporating budgetary and sales forecasts and any corresponding investment commitments already undertaken.

8. Submissions should be lodged with ComReg no later than 5p.m. Friday 1st August 2014.
9. ComReg will consider operator submissions, possibly with the assistance of independent experts, with a view to taking a position on the proposed changes to the CFLMP. It would be ComReg's intention to submit operator analysis and laboratory tests, trial methodologies and results to these independent experts for scrutiny. ComReg wishes to conduct this process in an efficient and timely manner and therefore, requires that operators strictly adhere to the submission deadline. ComReg would urge operators to submit part submissions in advance of the deadline date as they progress through their analyses especially if they are of the view that any analysis has highlighted a significant issue. If operators have any queries, please contact Tim Lynch of ComReg's wholesale department tel. 01-8049600.
10. Submissions should be emailed to: wholesaleconsult@comreg.ie and hard copies should be addressed to:

Tim Lynch
ComReg Wholesale
Commission for Communications Regulation
Abbey Court
Irish Life Centre
Lower Abbey Street
Dublin 1

2 Background

2.1 Introduction

11. As stated by Eircom in the CLFMP document (Issue 6) on the Eircom wholesale website¹:

“Operators, who wish to offer services across the local loop access network, need to have a high level of confidence that their services will operate as expected, both at the time of the deployment and in the future. Therefore, there is a need to minimise the level of interference, which may affect the access network. In order to control interference within an access network and so produce a predictable environment so that operators can make deployment decisions, it is necessary to have some form of frequency plan to which all deployed services conform.

This is referred to as the Copper Loop Frequency Management Plan (CLFMP). At its simplest, it is a list of rules governing the use of the copper loop access network. It also should not be overly restrictive, as it needs to aid the deployment of innovative services.

This CLFMP has been drafted by representatives of the industry, including eircom, other authorised operators (OAOs) and ComReg

It is recognised by all parties that this is a living document, which will need to be reviewed to deal with further developments in the area of deployment of future technology. Given the fundamental impact of this plan on the quality and breadth of services which operators can deploy on the network, as with the development of this plan, any modifications to it will be considered at an industry level under the chairmanship of ComReg. Any changes to the plan will require the explicit approval of ComReg.

The principle objective of the plan is to limit the signal levels transmitted by a system in order to protect the operation of other systems in neighbouring cable pairs. The approach taken to achieve this is by specifying a number of Power Spectral Density (PSD) masks with which equipment must comply.

Using this approach, the aim is therefore that a system permitted within the CLFMP can be deployed within a predictable noise environment.”

¹ Please go to www.eircomwholesale.ie then click on “Access products”, “Local Loop Unbundling”, “Full Unbundling” and then please refer to the related documents on the right hand side of the page, which includes the CLFMP document.

2.2 Scope of the CLFMP

12. As stated by Eircom in the CLFMP document on the Eircom wholesale website, the scope of the CLFMP is as follows:

- *“This CLFMP applies to the eircom copper loop network.*
- *The terms “copper loop”, “copper access network,” “local loop”, etc. are deemed to equate to the cable network between the local exchange main distribution frame (MDF) point and the customer’s premises Network Termination Point (NTP).*
- *Similar frequency plans will be required should other networks (e.g., other copper loop or cable TV networks) be unbundled.*
- *It is designed to enable, rather than guarantee, the co-existence of services.*
- *It covers the issues of cross talk between pairs, not technologies which could coexist on a single pair.*
- *It does not cover the issue of external RF ingress into access cables; this will be handled by ComReg where appropriate.*
- *This version addresses inputs at the exchange MDF, the cabinet and the customer’s premises.*
- *This Plan permits use of frequencies up to 2.208 MHz for exchange-launched services and of frequencies up to 17.664 MHz for cabinet-launched service and customer premises equipment (CPE). Frequencies above 17.664 MHz are reserved for further study and not allowed with this version of the Plan.”*

2.3 Modification and review of the CLFMP

13. Any operator can propose a modification to the CLFMP. These amendments are normally lodged through ComReg directly, or via one of its industry groups.

14. The change process is that any proposed changes are presented for debate to a specially convened CLFMP meeting and operators are allowed to respond. Under the agreed industry process as outlined in the CLFMP, ComReg is obliged to convene and chair an industry working group to consider any proposed modification to the CLFMP (these meetings can also be convened as a sub-meeting of another industry group).

“It is recognised by all parties that this is a living document, which will need to be reviewed to deal with further developments in the area of deployment of future technology. Given the fundamental impact of this plan on the quality and breadth of services which operators can deploy on the network, as with the development of this plan, any modifications to it will be considered at an industry level under the chairmanship of ComReg. Any changes to the plan will require the explicit approval of ComReg.

A CLFMP Working Group shall meet as required to review the implementation of the plan and make recommendations on adjustments in light of experience and technical developments.

Any such meeting will be convened by ComReg if required at the request of eircom or any access seeker. Timely notice of this meeting should be given to all access seekers. No change can be made to this document without agreement of ComReg after consultation with eircom and all access seekers².”

15. There is no time limit or detailed change process prescribed in the CLFMP. The time taken depends entirely on the attitude of industry stakeholders, particularly LLU operators who may have legitimate commercial/investment concerns if there were to be any potential technical impact on their service offerings. ComReg would at all times endeavour to facilitate agreement between operators where possible however, any final decision would be informed by our broad statutory remit: Protecting and informing Consumers; Promotion of Competition and Encouraging Innovation. It should be noted that any reference in the Eircom CLFMP document to “approval” or “agreement” from ComReg does not fetter ComReg’s future discretion in relation to its statutory powers.

2.4 Legal basis for change to the CLFMP

16. The CLFMP is part of the contractual suite of documents related to Eircom’s regulated Access Reference Offer (“ARO”) and is governed by the access and transparency obligations in the market for Wholesale Physical Network Infrastructure Access (“WPNIA”) (which includes LLU). These obligations are contained in, *inter alia*, ComReg Decision No. D05/10³.

² See CLFMP Issue 6.

³ ComReg Decision D05/10, ComReg Document No. 10/39 Response to Consultation & Decision Market Review: Wholesale (Physical) Network Infrastructure Access (Market 4) published 20th May 2010.