

**RÉSULTATS PUBLICS DE LA CONSULTATION PUBLIQUE NATIONALE  
DU 26 MAI 2017 AU 26 JUIN 2017**

**RELATIF AUX EXIGENCES TECHNIQUES ET OPERATIONNELLES MINIMALES REQUISES POUR  
L'INTERCONNEXION EN MODE IP POUR LA VOIX SUR LES RÉSEAUX TÉLÉPHONIQUES PUBLICS  
INDIVIDUELS EN POSITION DÉTERMINÉE**

**LUXEMBOURG, LE 22 AOUT 2017**

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**SECTEUR COMMUNICATIONS ÉLECTRONIQUES**

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Le présent document clôture le processus de la consultation publique nationale du 26 mai 2017 au 26 juin 2017 concernant le projet de règlement relatif aux exigences techniques et opérationnelles minimales requises pour l'interconnexion en mode IP pour la voix sur les réseaux téléphoniques publics individuels en position déterminée.

En application de l'article 4(3) du règlement 13/168/ILR du 21 août 2013 relatif à la procédure de consultation instituée par l'article 78 de la loi du 27 février 2011 sur les réseaux et les services de communications électroniques, l'Institut tient à rappeler qu'il tient exclusivement compte des commentaires qu'il a reçus durant la période de la consultation et qui se rapportent directement et uniquement au projet en question.

Ainsi, tout commentaire reçu après ce délai, ou qui ne se rapporte pas strictement au projet soumis à une consultation publique ne saurait être pris en compte et ne fera donc l'objet d'aucune publication de la part de l'Institut.

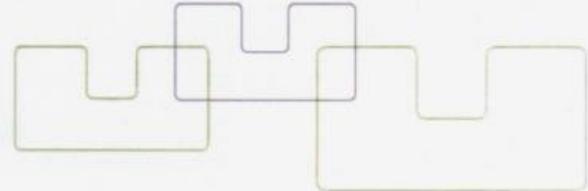
L'Institut a reçu une contribution de la part de :

- Join Experience S.A.

Le fait d'inclure ces commentaires dans ce document ne signifie nullement que l'Institut approuve ou désapprouve les opinions exprimées. L'Institut n'a pris en compte que les commentaires qui se rapportaient à l'étude en question. Les parties ne se rapportant pas au sujet spécifique qui étaient inclus dans les contributions n'ont pas été publiées.



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ILR  
Attn Mr Tapella  
17, rue du Fossé  
L-2922 Luxembourg

Luxembourg, June 22<sup>nd</sup> 2017

*Sent per e-mail and regular mail*

**Subject:** Join's contribution to below mentioned consultation

**Our ref:** 20170622\_reponse JOIN to ILR consultation IP Interconnect

Dear Mister Tapella,

**Concerns:**

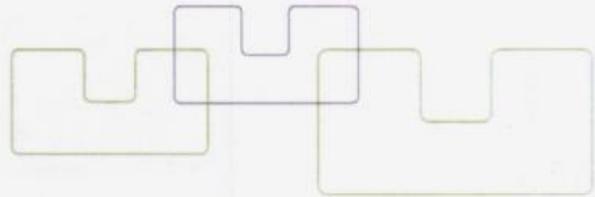
Response from Join Experience S.A. ('Join') regarding the public consultation on the minimal technical and operational requirements for IP interconnection

Please find herewith our comments/reactions/questions/proposals related to above mentioned public consultation. We refer to different paragraphs/quotes in the draft document for which we draft our comments/suggestions.

*§ 2..... A Session Border Controller (SBC) shall be used as a Border Function for SIP signalling and RTP traffic on each Operator's VoIP network. It must be redundant: in case the SBC of an Operator goes out of service, a second SBC (with the same virtual IP address or different IP address) must be able to take over the traffic automatically....*

⇒ Join is of the opinion that redundancy should not be imposed (as in the TDM world).  
In case redundancy is agreed between the parties it should be provided with the same virtual IP address

*§ 2.4..... The IP network built on top of this physical infrastructure shall be private....*



- ⇒ Join believes that “secure and isolated” is a more appropriate wording than “private”. “Private” in IP terms private network means it uses IP private address pool, however this is not the case here.

*§ 2.4.1...The IP network between the two Operators should be dedicated to the exchange exclusively of SIP messages, RTP, RTCP packets.*

- ⇒ Join is of the opinion that the wording should be adapted towards “The IP network between two operators should be used only for interconnect traffic between the concerned operators”. Alternatively, SIGTRAN or any other mutually agreed (and clearly defined) standard should be added at the end of the sentence.

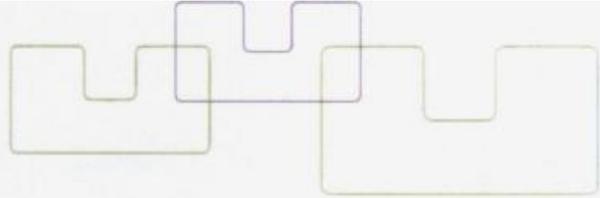
*§ 2.5. last paragraph... The Operator shall choose the mechanism of its choice to implement the forwarding behaviour, provided that: - the end-to-end delay of media traffic does not exceed 150ms...*

- ⇒ Join is of the opinion that wording should be changed to “involved operators shall choose” as the responsibility of one side with regards to end2end is not clear. It should say “involved operators” or interconnected parties. Alternatively, it should say “to implement forwarding behaviour on his area of responsibility”.

*§ 5.1. Phone number format*

- ⇒ No reference at all is being made in this paragraph nor somewhere else in the document towards number portability for mobile (MNP) and fix (FNP). It should be clearly mentioned that MNP and FNP must be supported (similar to what is required in the TDM interconnection).

Generally speaking a future proof architecture and solution should be implemented.



*§ 12.2. Call Forwarding services*

⇒ Join is of the opinion that anchoring of media traffic should follow the same path (in terms of traversed operators) to avoid black-holing of media traffic, if no transparent IP connection exists between operator A and C

We hope that your Institute will appreciate and consider carefully our comments/suggestions by adapting the final wording of the 'projet de règlement' accordingly. If there would be any comment/question related to our input, please do not hesitate to contact us.

Yours sincerely,

Luc Van den Bogaert  
VP Carrier- & Wholesale Business