



Office of the Director of
**Telecommunications
Regulation**

Dispute Resolution Determination

DISPUTE RESOLUTION DETERMINATION No. 02/02

Summary

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Oifig an Stiúirthóra Rialála Teileachumarsáide

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Summary of final determination of the Office of the Director of Telecommunications Regulation (ODTR) regarding a complaint by Esat (Esat Telecommunications & Ocean Communications) against *eircom* in relation to the provision of Logical ISI Interconnect.

In January 2002 Esat submitted a complaint concerning *eircom*'s refusal to provide 'Logical In-Span Interconnect'.

In its complaint Esat claim that from an engineering perspective, the most fault prone part of a fibre link would be its physical connections, in this case, the ODF (Optical Distribution Frame) especially if this is in the street furniture. Esat require *eircom* to provide a service whereby Esat takes a fibre optic cable to a designated footway box outside *eircom*'s exchange and leaves a sufficient cable tail to enable *eircom* to draw the cable through its duct for termination on the *eircom* ISI (In-Span Interconnect) terminal equipment. The point of interconnection would then be at a logical point – the footway box. The optical cable and fibres would be without physical interruption from end to end.

In response to the above claim *eircom* stated that Esat do not seem to be aware of how the current product is offered and configured. No street furniture is necessary. *eircom* supply a 144-fibre cable to a multi-port closure outside the *eircom* premises. This then feeds 12-fibre cables to OLO (Other Licensed Operator) nominated manholes. This maximises the use of duct space and allows for the once off termination of the 144-pair cable to the multi-port closure. A mini ODF is used to connect to the OLO at the manhole. The ODF facility also allows for power measurements to be made at the demarcation point, to verify the correct level of signal at the handover point, both at installation and later during maintenance. There is a clear demarcation point from both a legal and operational perspective. The ODFs are to the highest specification and do not decrease the reliability of a link in any measurable way.

In arriving at this determination, the Case Officer in accordance with the Dispute Resolution procedures has considered the comments received from both parties to the dispute.

The Case Officer understands the assertion that the most fault prone parts of a fibre link are its physical connections. The Case Officer is also aware that in reality, transmission systems necessarily have physical connections from a practical point of view. While keeping these physical connections to a minimum is best practice, decisions have to be made to allow flexibility and operational viability without sacrificing technical standards.

It is the Case Officer's understanding that the current ISI product offering from *eircom* was designed to maximise duct space and facilitate the connection of other OLOs' interconnects to the same *eircom* exchange in a reasonable and efficient manner. The request from Esat for a Logical ISI product would not allow for the maximising of the duct space from the *eircom* premises and provides for no physical demarcation for the point of interconnection. However, the Case Officer finds that a splice joint at the point of Interconnect is a technically viable alternative to an ODF and directs *eircom* to offer this as an alternative in their Reference Interconnect Offer (RIO).

This decision has been notified to the parties who have a right of appeal.