



## **Response from Tele2 Group on ERGs draft Common position on VoIP**

### **1. Introduction**

Tele2 ([www.tele2.com](http://www.tele2.com)) is Europe's leading alternative telecom operator, providing consumers and enterprises with a wide range of fixed and mobile services. Tele2 welcomes ERGs attempt to harmonize the treatment of VoIP services through its draft "Common position on VoIP".

### **2. Access to emergency services.**

Tele2 agrees with ERGs recommendation that all telephony service providers (including VoIP service providers in category 2, 3 and 4) should be obliged to provide access to emergency services. Tele2 also agrees with the soft approach towards caller location, as this should only be provided to the extent allowed by the technology. Furthermore, we endorse the suggestion that telephony service providers should be obliged to provide the emergency response center with the information that a caller is a potentially nomadic user. This will give the emergency center the information necessary to double check the location of the caller.

### **3. Number portability**

Number portability between different VoIP services and the traditional PSTN/ISDN services is important, in order for the customer to switch to the preferred telephony service as easily as possible. This is important both from a consumer perspective and from a competition point of view. Tele2 therefore supports the conclusion that number portability obligations should be imposed on VoIP providers, and to allow number portability between traditional telephony services and VoIP services.

### **4. Allocation of consumer rights and service provider obligations**

As a general approach VoIP providers in category 2, 3 and 4 should have to comply with the same set of obligations regarding consumer rights as traditional PSTN services. Tele2 therefore agrees with the proposal made by the ERG on this issue.

Best regards

**Tele2 Group**

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