

## **Copper retirement – process for determining when copper regulation can be removed**

### **Executive Summary**

JRC and its Members welcome the opportunity to respond to this consultation.

JRC agrees to the proposal to delay the decision to remove the Copper Charge Control until after Ofcom's final decisions on the WFTMR statement to consider how to define the circumstances in which premises can be excluded from the definition of a completed ultrafast exchange in which the copper charge control can be lifted.

Whilst the removal of the Copper Charge Control won't automatically lead to the immediate loss of copper services, JRC is keen to work with Ofcom to ensure that the resilient operation of critical national infrastructure (CNI) and the UK Energy Networks shall not be detrimentally impacted by the removal of the Copper Charge Control. The Industry has actively engaged with its Communications Providers' to proactively address the transition from copper to fibre-based solutions. As a consequence of this engagement it is clear that alternative products to satisfy the industry's requirements are not currently available and of greater concern the Communications Providers are not actively engaged with the transition. Without a credible cost effective alternative to the copper based solution there is a real risk that the Energy Networks Operational Control systems will be compromised and therefore we encourage Ofcom to reserve the right to continue to administer the regulatory charge control of copper for Energy Network Operators.

More generally, we note concerns from initial analysis by the Industry that a wholesale migration of Operational Control systems from Copper to Fibre connections imposes a significant technical challenge to the sector with enhanced cost and risk to the provision of essential services to UK Energy Consumers and will potentially compromise the sectors ability to serve vulnerable customers.

### **Background**

Joint Radio Company Ltd is a wholly owned joint venture between the UK electricity and gas industries specifically created to manage the radio spectrum allocations for these industries used to support operational, safety and emergency communications.

JRC manages blocks of VHF and UHF spectrum for Private Business Radio applications, telemetry & telecontrol services and network operations. JRC created and manages a national cellular plan for co-ordinating frequency assignments for several large radio networks in the UK.

The VHF and UHF frequency allocations managed by JRC support telecommunications networks to keep the electricity and gas industries in touch with their field engineers. These networks provide comprehensive geographical coverage to support installation, maintenance and repair of plant in all weather conditions on 24 hour/365 days per year basis.

JRC's Scanning Telemetry Service is used by radio based Supervisory Control And Data Acquisition (SCADA) networks which control and monitor safety critical gas and electricity industry plant and equipment throughout the country. These networks always provide resilient and reliable communications to unmanned sites and plant in remote locations to maintain the integrity of the UK's energy generation, transmission and distribution.

JRC supports the European Utility Telecommunications Council's Radio Spectrum Group, and participates in other global utility telecom organisations. JRC participates in European



Telecommunications Standards Institute (ETSI) working groups developing new radio standards, and European telecommunications regulatory groups and workshops.

JRC also manages microwave fixed link and satellite licences on behalf of the utility sector.

JRC works with the Energy Networks Association's Future Energy Networks Groups assessing ICT implications of Smart Networks, Smart Grids & Smart Meters and is an acknowledged knowledge source for cyber-security in respect of radio networks.

## JRC's Response to Question

**Question 1: Do you agree with our proposal to wait until after the publication of the WFTMR statement to define the circumstances in which premises can be excluded from the definition of a completed ultrafast exchange, by giving a direction under the future WFTMR SMP conditions?**

**Please set out your reasons and supporting evidence for your response.**

### **JRC Response**

Confidential? No.

JRC agrees to the proposal to delay the decision to remove the Copper Charge Control until after Ofcom's final decisions on the WFTMR statement to consider how to define the circumstances in which premises can be excluded from the definition of a completed ultrafast exchange in which the copper charge control can be lifted.

Whilst the removal of the Copper Charge Control won't automatically lead to the immediate loss of copper services, JRC is keen to work with Ofcom to ensure that the resilient operation of critical national infrastructure (CNI) and the UK Energy Networks shall not be detrimentally impacted by the removal of the Copper Charge Control. The Industry has actively engaged with its Communications Providers' to proactively address the transition from copper to fibre-based solutions. As a consequence of this engagement it is clear that alternative products to satisfy the industry's requirements are not currently available and of greater concern the Communications Providers are not actively engaged with the transition. Without a credible cost effective alternative to the copper based solution there is a real risk that the Energy Networks Operational Control systems will be compromised and therefore we encourage Ofcom to reserve the right to continue to administer the regulatory charge control of copper for Energy Network Operators.