

Proposed guidance consultation

Question	Your response
Question 1: Do you consider the measures in the proposed guidance relating to the resilience of the physical infrastructure domains to be appropriate and proportionate?	Confidential / N This is something a lay person is not qualified to answer.
Question 2: Do you consider the measures in the proposed guidance relating to the resilience at the Control Plane to be appropriate and proportionate?	This is something a lay person is not qualified to answer.
Question 3: Do you consider the measures in the proposed guidance relating to the resilience of the Management Plane to be appropriate and proportionate?	This is something a lay person is not qualified to answer.
Question 4: Do you consider the measures in the proposed guidance relating to communications providers' own managed services to be appropriate and proportionate?	This is something a lay person is not qualified to answer.
Question 5: Do you consider the measures in the proposed guidance relating to communications providers' arrangements for preparing for adequate process, skills and training to be appropriate and proportionate?	This is something a lay person is not qualified to answer.

Call for Input

Question	Your response
CFI question 1: Does this framework accurately capture the factors relevant to assessing what is an appropriate and proportionate measure for MNOs to take with regards to power resilience for RAN cell sites?	Confidential? / N Again, difficult to say.

Question

Your response

CFI question 2: Do you agree that at a minimum MNO's networks should be able to operationally withstand short term power-related incidents?

Absolutely, short term power outages should not have any impact to services whatsoever.

CFI question 3: What mobile services should consumers be able to expect during a power outage, what consumer harms should power backup up focus on mitigating and does this vary depending on the type or duration of the outage?

Full service as reliance on a mobile service to contact emergency services in the absence of a landline is critical. No land line and no mobile service could result in loss of life no matter how brief the outage.

CFI question 4: What technical choices are available to MNOs to reduce power consumption, and should be considered as part of assessment of appropriate and proportionate measures?

I don't have the technical knowledge to comment.

CFI question 5: How many sites would it be feasible to upgrade and maintain and why?

Again, I am not qualified to answer.

CFI question 6: Do you consider that providing a minimum of 1 hr backup to all RAN cell sites would be proportionate to meet the security duties under s.105A to D of the Communications Act 2003?

No.

CFI question 7: What cost effective solutions do you consider could meet consumers' needs during a power outage?

If it is not possible to guarantee landline service during an extended outage, mobile services **must** be available.

CFI question 8:

a) Is it more cost efficient to increase power backup up to any space, weight, or planning limitations, i.e., increasing power backup as much as is feasible provides the lowest £ per hour?

I have no idea.

b) do the benefits of any power backup solution have diminishing returns, i.e., the benefit per hour decreases as you increase the amount of power backup?

Probably but yet again it is a very specialised question.

CFI question 9: Does the mobile market fail to capture the value or importance of power backup, and if so, why?

Probably because they have never personally been without power for a period of days.

CFI question 10: Should improvements in power backup be focused on solutions at sites which are identified as higher risk of outages?

Yes.

Question**Your response**

CFI question 11: Why would any requirement lower than a minimum of 1 hour be sufficient in future? What duration do you consider would be sufficient and why?

An hour is a pathetic minimum. 48 hours would be a bare minimum, longer would be better.

CFI question 12: Over what time period could industry make upgrades to provide a minimum of 1 hour at every cell site or other cost-effective solutions to address potential consumer harm?

Improve UPS provision, harden the power lines to the site.

Please complete this form in full and return to resilience.team@ofcom.org.uk.

I might add that the consultation document is far too technical for most people to understand fully or correctly. Those of us living in rural areas have a huge reliance on land line and mobile telephony services. The migration away from copper analogue services means that an extended power outage means that such communities will have no means of communication to obtain information about the power outage or, more importantly, contact the emergency services. Your house could be on fire and you would be helpless.

Given the greater incidence of severe weather events, power outages and thus comms outages are more likely than ever and you should be working not to reduce resilience by decommissioning copper analogue services even with the band aid of an hour or two of UPS backup but to maintain and improve resilience. Failure to do so may well result in people dying.