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Dear Ofcom,

### **Ofcom's Resilience guidance consultation**

I am writing to you on behalf of Open Fibre Networks Limited (OFNL), part of the BUUK Infrastructure Group of companies, in response to [Resilience guidance consultation](#) which was published in December 2023. I can confirm that this response is not confidential and can be published on the Ofcom website.

### **An introduction to BUUK and OFNL**

BUUK Infrastructure (BUUK) is a leading UK multi-utility infrastructure investor, working across Great Britain and competing against incumbent utility companies. We have provided over 2 million utility connections and now serve customers across 30,000 discrete networks and six essential utilities. Our main shareholder is Brookfield, a global investor in property, infrastructure and renewable energy. We cover every utility vector and can therefore provide a unique perspective on evolving utility and regulatory policy.

We apply our considerable experience, across multiple utilities, to the fibre industry via OFNL which has been providing gigabit ready full fibre broadband connections to the new build housing sector since 2008. Our fibre networks are often chosen by developers in preference to the solutions offered by the monopoly incumbent. We also operate a wholesale business, Open Fibre Networks (Wholesale) Limited (OFN(W)L), offering wholesale services to Communication Providers across the UK.

### **Ofcom's Resilience guidance consultation**

Within the context of the increased value that is now attached to technological connectivity, we acknowledge the importance of ensuring that accepted operational practices across the industry are effective in securing the overall resilience of the broadband network. We therefore welcome Ofcom's review of the existing guidance on resilience related security duties. We consider the review to be of particular value given that a key driver of the work was to respond to industry requests for greater clarity on how best to comply with resilience requirements. In this respect, we anticipate that the revision of the guidance will help to secure a minimum level

of resilience across the industry and therefore facilitate Ofcom's overall aim of supporting the provision of networks and services which are robust, available, and working well.

We welcome the collaborative approach that Ofcom took toward the revision of this guidance; proactively engaging with a cross-sector of industry stakeholders to better understand the current resilience baseline and identify best practice. We think that the resulting guidance effectively captures the current industry baseline while providing the scope for CPs to implement further measures in areas where they identify specific risks to continued customer connectivity. We also expect the structure of the proposed guidance to support a rigorous industry approach to compliance. In this respect, setting out clear Ofcom expectations around the resilience measures that CPs should consider implementing across each of the components of its network infrastructure, will help to ensure there is clarity about the minimum standards that should be met in each of these areas.

I hope these comments are helpful. I would be happy to discuss our response in more detail; please feel free to get in touch via [REDACTED]

Yours sincerely



Keith Hutton

**BUUK Group Regulation Director**