

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?	<p>Absolutely not. See also CFI Q1</p> <p>Storms and power outages are becoming more frequent in Ballater. During Storms, Arwen, Malik & Corrie we were only able to maintain contact with our local authority for advice and assistance, (e.g. arranging dialysis for one resident; food provision), via the one landline in our community halls complex. (For a very short time the one public telephone box in the village was operational but its coinbox quickly became full putting it out of commission).</p> <p>Many residents are greatly concerned about our community's increased vulnerability when the PSTN is decommissioned.</p>
Question 2: Do you consider the measures in the proposed guidance relating to the resilience at the Control Plane to be appropriate and proportionate?	Not qualified to comment
Question 3: Do you consider the measures in the proposed guidance relating to the resilience of the Management Plane to be appropriate and proportionate?	Not qualified to comment
Question 4: Do you consider the measures in the proposed guidance relating to communications providers' own managed services to be appropriate and proportionate?	Not qualified to comment
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?	Not qualified to comment

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?	<p>Having experienced being responsible for providing community support in a Rest Centre for three days with no mobile service and only one analogue phone line, I would suggest that in remote rural areas the backup should be for at least 4 days. Residents had to travel 25 miles to Banchory to find a power source which enabled mobile calls.</p> <p>While this outage was caused by storms, I have grave concerns about how remote communities will safely survive when the PSTN system is completely decommissioned.</p>
CFI question 2: Do you agree that at a minimum MNO's networks should be able to operationally withstand short term power-related incidents?	<p>Yes, but the minimum should reflect the distance to the next available mast, bearing in mind that it too may be damaged.</p>
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?	<p>Certain contact with emergency services and monitored alarm services for both elderly and vulnerable individuals.</p> <p>In the incident mentioned in Q1 above there were ongoing issues trying to urgently arrange dialysis for a resident.</p>
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?	<p>Not qualified to comment.</p>
CFI question 5: How many sites would it be feasible to upgrade and maintain and why?	<p>Not qualified to comment.</p>
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?	<p>No - see answer to CFI Q1</p>

Question

Your response

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

Category 1 and category 2 responders should be provided with a means of making contact, at least, with other emergency agencies during critical incidents.

CFI question 8:

Not qualified to comment.

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?

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?

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

In my view Yes. Likely because the personnel involved have never found themselves in an emergency situation where urgent, effective communication could mean the difference between life and death.

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

Most definitely.

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?

Not qualified to comment.

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?

Not qualified to comment.

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