

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? – Y
Question 2: Do you consider the measures in the proposed guidance relating to the resilience at the Control Plane to be appropriate and proportionate?	Yes. The piece is clear on roles and responsibilities, and the mitigations appear to be realistic. Frameworks and procedures should be business as normal, hopefully companies can test and validate current frameworks and add any identified learning.
Question 3: Do you consider the measures in the proposed guidance relating to the resilience of the Management Plane to be appropriate and proportionate?	Yes, appears to be common sense to have more flexibility than in band, and remote access if needed.
Question 4: Do you consider the measures in the proposed guidance relating to communications providers' own managed services to be appropriate and proportionate?	Yes, again roles and responsibilities are clear. This promotes clear spec for design, and to encourage resilience from the starting point.
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?	Yes, encourages good practise and installing training at various stages. Promoting written plans is wonderful, especially at the short, medium and long term. – monitoring is also wonderful, however, completing validating exercises would also be beneficial. Lovely to see BCP mentioned.

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? – Yes, but I can not say I understand all the jargon, but I recognise the push towards contingency planning.
CFI question 2: Do you agree that at a minimum MNO's networks should be able to operationally withstand short term power-related incidents?	Yes
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>Yes it depends on geographical factors and the type and duration of the incident. Link in with Local authorities should occur to discuss collaboratively the key vulnerabilities, and mitigations.</p> <p>Mobile phones, sms at least. We promote personal resilience and one element is ensuring you have a battery pack for your phone. If they could access sms we can get messages out. It would be better if they could access the internet as then those affected can access MNO's internet updates.</p> <p>Risk to life, those who have a priority due to health conditions (life saving equipment), battery packs only lasting 6 hours etc.</p> <p>Private Care homes, high risk, and are less likely to have emergency plans in place.</p> <p>-traffic lights- road controls</p> <p>Would be useful if Local Authorities could share list of key hubs- if these were prioritised – emergency plans could be worked around these – we could tell the public to converge in areas where power might come back on quicker.</p>

Question

Your response

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?

Terribly sorry but I do not have the expertise to answer this question.

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

Unsure

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

Unsure. I believe this would be dependant upon the type of incident and the range of end users affected.

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

I do not have the expertise to answer this question, however the most affective we have noticed is a generator in the short time, progressing to more permanent solutions- allows for power to be reinstated, and then allows for appropriate communication on the permanent solution to circulated.

Realistic timelines, leaflet drops, being available to answer questions and help with rehousing if needed.

CFI question 8:

Not my area of expertise.

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?

Question

Your response

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

I do not think that there is any association who really understands or values mitigating procedures and emergency plans.

Any response is highly scrutinised, any undue detail etc is a reputational risk to any mobile provider.

There is also the fact that if a death does occur and it is due to a lack of power backup and mitigating plans the MNO could be held accountable.

Financial and reputational risk.

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

A starter for ten would be – I would imagine though that interrelations could be seen across the networks.

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?

I believe the best way to answer this would be to test and exercise the process. I believe that it would depend on the incident and the variables involved which could mean that an hour is not enough, whilst in a=other examples plenty.

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 my area of expertise.

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