



FCS response to Ofcom consultation: Resilience guidance consultation and Call for Input on mobile RAN power back up. Proposal for updated guidance for communications providers on resilience related security duties under the Communications Act 2003.

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. The FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes Ofcom's review of resilience requirements. Network resilience is key to delivering services consumer and business customers can rely on, increasing confidence in the market and safeguarding vital services.

The FCS is broadly in agreement with the proposed changes to the guidelines. As a trade organisation representing varied businesses, we have a number of general comments that we think will be useful to the debate:

Updated Guidance for telecoms network resilience

- The FCS is encouraged to see that learning from post incident reviews is being shared and used to further refine resilience approaches which should benefit the whole industry. It is important that such learning is widely available to the appropriate parts of the supply chain.
- The FCS believes that regulation needs to be focused on the appropriate part of the supply chain. To promote economic growth and innovation, it is important that the supply chain is properly understood, and regulation focused on the wholesale market. This will allow the most efficient outcomes, with costs appropriately spread throughout the supply chain. This should also help to ensure standardisation across the industry.

For example, battery back-up solutions should be standardised across network providers which will enable easier migration between providers and strengthen competition. This should also reduce e-waste, cut costs across industry and ensure that smaller retailers and the complex supply chain are not disadvantaged. This approach should be applied across fixed, wireless and future networks.

Call for input on power backup for mobile radio access networks (RAN)

- Given the move to all-IP, it will be increasingly important that mobile networks provide appropriate resilience. From the break-down of power outages, a 1 hr RAN back-up seems to be appropriate and a proportionate approach. It will be important that access to the mobile network is available throughout the complex supply chain on fair and reasonable terms. Additionally, Fixed Wireless Access should not be overlooked as it does have a significant role particularly in rural areas, and there are a large number of small ISPs and infrastructure operators in that space.

The FCS would welcome the opportunity to discuss these points with Ofcom and are very happy to provide any clarification if helpful.

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