

26th February 2024

CP Resilience Team (Network and Communications Group)
Ofcom

BY EMAIL

Response to “Resilience guidance consultation”

Magrathea welcomes the opportunity to respond to this consultation which seeks to improve upon the existing resilience guidance published by Ofcom.

In general, we find the proposed measures in the guidance to be appropriate and proportionate when you factor in that the measures are to be applied where appropriate and proportionate too.

However, we would specifically like to comment on a number of points which deserve further exploration and clarity.

Power back up

The requirement for core networks to be prepared for extensive power outages lasting for 5 days is understandable, but in most cases will rely on the power supply to one or a series of datacentres. We would like clarification that by engaging the services of a reputable datacentre provider who offers suitable power back up assurances, this would satisfy the requirements. In these circumstances we would consider it disproportionate, costly and inefficient to provide additional power back up solutions over and above those provided on site – even if such an option was available, which we don’t believe it would be unless the site was fully owned by the CP.

Network Management

The draft guidance quite rightly suggests that where proportionate (e.g. for critical services) the service should not be reliant on the wider internet. As a carrier network we feel it appropriate to be able to require vital (e.g. tier 1 carrier grade) interconnect arrangements to be dedicated to the exchange of voice traffic between two parties.

In contrast, we do also encounter many situations whereby we consider it proportionate and appropriate to interconnect via links which would be considered internet based. In doing so enables a wider number of service providers to access core networks such as ours at competitive rates, with fewer barriers.

Whilst these links do share traffic with other service types, they are still specified and engineered with the voice traffic in mind and often never enter what might be considered

the general internet, as traffic is exchanged between the two networks at an interchange point such as LINX.

In these scenarios, lower call volumes and non-essential services provided to a sub-set of end users, the impact is generally manageable in the event of an internet related issue. To introduce onerous obligations on these smaller providers would stifle innovation, reduce competition and increase costs for consumers.

However, the draft guidance does include a note (38) which seems to imply that only services provided on dedicated connections (i.e. not using general internet) can be considered primary line, or PSTN replacement services. The implications of this filter through the whole value chain from core to user.

It is our opinion that this note needs further clarification and should form part of the guidance body itself as it is critical to the understanding of the variety of services available today.

We know there are many 'over the top' services that rely on user access to the general internet to function and these are becoming more prevalent as we migrate away from the PSTN. End users can opt to rely on an altnet for their broadband and an OTT service for their voice solution, giving them maximum choice and availability of appropriate services.

If we were convinced to agree that these services cannot be 'primary line', we believe it would then be appropriate for Ofcom to differentiate them in the general conditions. Specifically in relation to emergency calls and prevent the provision of critical services from being a service requirement as it is today.

Instead, and our preferred option, would be to require providers to educate consumers so that they are aware of the differences between an 'on-net' (ie. VoBB) service compared to an OTT one, with any potential limitations or variations in service. This approach would continue to support the considerable variety of excellent services that are available to consumers without inadvertently skewing competition in favour of the fully integrated service providers.

Where a provider does not control the IP connection, they could of course potentially suffer resilience or quality issues beyond their control and therefore they should not be expected to engineer their network to standards that are significantly above those provided at the most vulnerable layer of the service.

We remain available to discuss any of these points further if Ofcom should wish to do so.

Yours faithfully,



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