

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?	No – inadequate.
Question 2: Do you consider the measures in the proposed guidance relating to the resilience at the Control Plane to be appropriate and proportionate?	No – inadequate.
Question 3: Do you consider the measures in the proposed guidance relating to the resilience of the Management Plane to be appropriate and proportionate?	No – inadequate.
Question 4: Do you consider the measures in the proposed guidance relating to communications providers’ own managed services to be appropriate and proportionate?	No – inadequate.
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?	Uncertain

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?	Capture OK, assessment inadequate

Question

Your response

CFI question 2: Do you agree that at a minimum MNO's networks should be able to operationally withstand short term power-related incidents?

What is short term? There should be adequate resilience.

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?

Dec 2022 power outage 4-7 days. Mobile coverage failed at some stage. Personal mobile unable to recharge. Only communication was through "copper" landline. Anything else inadequate.

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?

Unknown

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

Unknown

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?

Nowhere near proportionate. Should be measured in days, not a single hour.

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

Unknown

CFI question 8:

Unknown

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?

Yes – experience Dec 2022

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

Should cover all sites unless there is plenty of overlap between sites (NOT the case here).

Question

Your response

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?

Never be sufficient.

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?

Unknown

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