

Dear Sir/Madam

I am writing in response to the consultation on Ofcom proposals to update their existing resilience guidance, and the role of providers of public electronic communications networks and services (PECN and PECS), highlighting the unique challenges faced by my constituents in Shetland. Of particular interest to those in rural and island communities are the proposals to provide a minimum of one hour backup to radio access network (RAN) cell sites.

There are significant concerns in the local community about the resilience of any replacement systems for self-powered landlines in the face of emergency events or unplanned power outages. As you may be aware, in December 2022, parts of Shetland faced significant power outages due to a period of winter weather and snowfall, with some houses not reconnected for six days. Cell sites were also affected. This left some customers without any means of calling for help, or contacting the emergency services. The move towards a reliance on both voice over Internet Protocol (voIP) landline services and mobile cell sites over the coming years poses a significant challenge for communities facing prolonged and widespread power outages.

It is not at all clear that a one hour back up would prove sufficient in such cases and any network that is reliant on a battery unit will not be as resilient as a landline which is powered through a dedicated copper connection.

It is important to note that the poor weather in Shetland last winter was exceptional, but not unprecedented, and it is crucial that any alternative system provides a robust long-term solution. The climate emergency and resulting changes to our weather systems mean that unusual weather events are predicted to become more, rather than less, likely. The series of recent storms, poor winter weather and subsequent power outages across Scotland at the beginning of 2024 continue to highlight the importance of these questions.

Any permanent replacement for the current system must be resilient enough to ensure that people are always left with a way to reach the emergency services or contact outside assistance. As you will appreciate, it is during such emergency situations that reliable means of communication are most necessary.

Rural areas will also be covered by fewer overlapping cell sites, so these should be considered a higher priority for longer term battery back-ups where, if these fail, there are unlikely to be any alternatives. Sites in exposed locations, or which have seen previous outages due to weather, should also be prioritised. Consideration should also be given to the resilience of single cell sites that serve islands communities, such as the masts on Foula, Fair Isle and Out Skerries in my constituency.

The questions around power supply and resilience are compounded in Shetland by ongoing issues with broadband and mobile cell site coverage which, at this stage, cannot be assumed to be universal across rural and remote areas. The main build for the Scottish Government's R100 Programme is not scheduled to be completed locally until 2027/28, and the broadband voucher scheme, for those households left out of the main build, remains unpopular with consumers. It has never been made clear to me how customers who are not scheduled to receive a broadband connection until 2028 will be transferred to a VoIP telephone system by 2025.

The role and importance of mobile network operators and their infrastructure needs to be considered in the context of these changes.

Ultimately, national guidance that defines the resilience of these networks for operators must

work for all customers across the country, not just those in urban areas.

Yours faithfully

Beatrice Wishart MSP