

## Consultation response form

Please complete this form in full and return via email to [ipmigration@ofcom.org.uk](mailto:ipmigration@ofcom.org.uk) or by post to:

IP Migration Team  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	<b>Proposed Guidance on protecting access to emergency organisations when there is a power cut at the customer’s premises: Proposals for guidance on General Condition A3.2(b)</b>
<b>Full name</b>	Adrian Grilli
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Joint Radio Company (JRC) Ltd
<b>Email address</b>	[X]
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential?</b>	Nothing
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## Your response

**Do you agree with the four proposed principles? If not, please give reasons. Please set out your comments on each of the principles separately.**

The four principles proposed in the consultation appear wise and well founded.

However, there appear to be a number of significant assumptions in the consultation without the evidential basis to support the position being adopted. These include:

- The assumption that mobile phone networks will provide service during power cuts. Because of the nature of the mobile networks, there will often be coverage into a 'blacked-out' area from mobile base stations served by power supplies still operational, but there is no indication of the expected time during which the mobile phone network will continue to function during a power outage affecting a wide area. (The Royal Academy Of Engineering Report “Living without electricity” provides significant insight in this respect. <https://www.raeng.org.uk/publications/reports/living-without-electricity>)
- The one hour minimum duration seems sensible given the Ofgem data that 67% of power outages are restored within 1 hour – although that still leaves 33% of outages

with durations greater than 1 hour. (The number of outage durations exceeding 12 hours appears irrelevant in this context.)

- The assertion that most calls to the emergency services would occur shortly after the initial power outages has no evidential basis. There may well be calls to the emergency services immediately after the outage associated with the outage (e.g. electrocution); but there may be an inverse correlation after the initial surge of calls. These may be medically related calls for vulnerable persons suffering as a result of inoperative machinery, cold or heat; or fire related events. For example, it is reported that during the power outage on the East Coast of the USA in August 2003, there were 3000 fires due to use of candles for lighting. It is likely many of these fires were after the first hour of the power cut, (since the initial power outages were during the day), by which time any mobile phone connectivity which did exist is likely to be exhausted.
- Paragraph 3.10 describes a situation where some 'households have a history of long-duration power outages'. This is an unsafe basis on which to require CPs to apply additional protection since if electricity customers experience a history of long duration outages, it is incumbent on the electricity network provider to remedy the situation.
- Finally, the increasing use of femtocells to provide domestic mobile coverage, back-hauled on broadband, will not work if a power cut is not addressed.

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