

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

*By Email*

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## **Response to proposed guidance on protecting access to emergency organisations when there is a power cut at the customer's premises**

We welcome the opportunity to comment on this guidance and have noted our concerns with some of the principles below. However, it is important to note that Magrathea are fully supportive of the overarching principle of the General Condition and its purpose, it is the means to achieving it that we feel needs further clarification.

### **CPs should have at least one solution that enables access to emergency organisations for a minimum of one hour in the event of a power outage in the premises**

For the purposes of this "CPs" could include any PATS provider, PECN or OTT provider meeting PATS criteria. We would consider the primary aim of the GC is to ensure premises remain connected to the internet in the event of a power outage and therefore it would be more logical for the access provider to address that element of the service. Without this any OTT provision will fail regardless.

It is our opinion that by leaving the guidance so open to interpretation and liaison between unrelated parties there could be disagreements over who has responsibility which will inevitably result in no solution being achieved.

### **CPs should take steps to identify at risk customers and engage in effective communications to ensure all customers understand the risk and eligibility criteria and can request the protection solution**

As written the proposed guidance puts a requirement on Magrathea, as a PECN provider to OTT providers, to assess risk of users. Magrathea have no direct knowledge of the end user and the extensive effort required to research and understand the diverse market covered by each of our clients would be disproportionate.

It is our view that the providers of services direct to end users are better positioned to establish risk, furthermore that this is more appropriate to the access networks who will have better knowledge of geographic requirements, home mover's data etc.

**CPs should have a process to ensure that customers who move to a new house or whose circumstances change are aware of risk and available protection**

As explained above, neither Magrathea or our clients are likely to be notified of changes in circumstances and the work required for those of us with little or no end user contact to monitor and assess risk on an ongoing basis is disproportionate and unfeasible.

**Summary**

We do agree that each case should be assessed on its own merit and that remedies should be proportionate with each CP considering their own business model, however with the guidance being quite broad Magrathea would appreciate some reassurance that in situations such as ours it is sufficient to carry out a full and detailed risk assessment of the part we play in delivering and maintaining service, potentially playing a part in raising awareness amongst our client base, to satisfy our PECN obligations under this guidance.

Yours faithfully,

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