

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?</p>	<p><i>Is this response confidential? – N</i></p> <p><i>RethinkPNT welcomes the prioritisation of wireless services, network resilience and evolution and the contribution to the Government's strategic priority to deliver secure and resilient telecoms infrastructure.</i></p> <p><i>There are two aspects in the plan that RethinkPNT provides feedback on.</i></p> <p><i>Firstly, the wireless telecommunications network (all providers, including DAB) in the Southwest of the UK still has several "not spots", including around road and rail infrastructure into and within Somerset, Devon, and Cornwall. You have a stated priority to further the interests of telecoms consumers including access [to] affordable services.</i></p> <p><i>RethinkPNT suggest your activities include actions to strongly encourage telecom providers to work together, including with those who provide services around rail and road infrastructure, to ensure that these areas of no signal (not even 2G) or lack of reliable data service provision (such as the railway line mostly from Taunton to Totnes) are covered to the same level as other parts of the country.</i></p> <p><i>Secondly, in your plan you commit to contributing to secure and resilient telecommunications infrastructure. Our current national approach introduces a significant dependency upon Global Navigation Satellite Systems (GNSS) to provide the critical position and time information used within critical infrastructure and is often second only to power in the network planning function. The dependency introduces, often unknown, vulnerabilities into our networks and this increases risk of failure, reduced resilience, and lower network security. The UK Government</i></p>

Blackett review in 2018 on the dependency of critical services to loss of GNSS outlines this in stark detail. This risk is increased as new services such as 5G and “internet of Things” wireless networks are rolled out.

*RethinkPNT suggests that the activities within this 2023/4 plan **immediately** start to **address** these systemic **vulnerabilities to services** by ensuring that market-based, private non-telecommunications wireless solutions are enabled to provide mitigation to the vulnerability to the loss of GNSS.*