

## **Additional comments:**

From the cosy vista of their expensive modern penthouses in London Docklands whilst also having the backup of the latest GSM enabled Iphone or Ipad provided by their employer to the senior directors of Ofcom power cuts of more than a few minutes in length are things that they have clearly not apparently personally experienced.

Perhaps they therefore need to base their consultation on hard facts based on what actually happens to the power supply in much of the rural countryside after major storms where tens of thousands of homes are usually off supply for many hours and in rural Scotland or Wales this period can routinely extend to several days after major storm or flooding damage.

I personally only live in the countryside on the Surrey/West Sussex border seven miles west of Gatwick Airport and close to the Gatwick flight path but as EDF Energy had not bothered adequately modernising its electricity network here including its fault self reporting capabilities following a major storm here five years ago I was off supply for around 13 hours between morning and evening. Then only a few weeks later after a major tree fell across the trunk cable to the village my home and several hundred others here were off supply for around 20 hours including the whole of the night. Locals in the village also tell me that after the 1987 storms parts of the village had no power for a week.

It is all too typical of the predictably slimey way in which Ofcom senior staff consistently always acquiesce to the profit only focused objectives of the corporate executives (who they are all too aware pay their quite unreasonably large remuneration packages) that it cuts an already grossly inadequate 4 hour backup battery specification period for a fibre optic line capable handset down to only 1 hour. Also is the 1 hour one hour of calls or only one hour of standby after power failure?

The average mobile phone is now capable of 4 hours of talk time and 300 hours of standby time on only a small lithium battery pack but good old Ofcom seems to think that only a couple of silver oxide cells will do as these no doubt allow the business interests that are almost its only concern to sell their handsets for fibre optic lines a little more cheaply.

The average local telephone exchange using copper wires can currently keep the phones going for several days in the event of a power cut on the exchange by heavy duty battery backup or oil based generators that cut in so how can only one hour possibly be acceptable when people are cut off in remote areas in say serious winter snowdrifts or after floods that do not recede for several days.

Ofcom also talks nonsensically about wider GSM handset ownership meaning there is no need to worry about a landline handset working for not very long after a power cut. Do the clowns at Ofcom genuinely not actually realise that in rural areas mobile phone base stations are themselves reliant on precisely the same overhead power supply lines that will have been taken out by a storm that has felled trees etc across the major trunk lines so that even their latest flashy Iphone handsets or 3g enabled Ipads will also report no signal as being available.

If these mobile phone base stations have any battery backup at all it is again only of the hour or two variety that Ofcom is so keenly acquiescing to here because inevitably the same Ofcom will have previously agreed to what is commercially most expedient for mobile phone operators no doubt on the basis at the time that the fixed line network would continue to run

for several days in such a situation. Now a later Ofcom consultation cuts down the time of battery operation of fibre optic fixed line handsets to only an hour. Lack of joined up strategic thinking in favour of short term commercial interest appears to have been Ofcom's hall marks ever since it was created.

If these fibre optic handsets only have to work for an hour on their battery when they are new then how many will work for more than a few seconds when they are six years old and their owners have inevitably not updated the batteries in the handsets in the way they were meant to.

I am sure that it is inevitable that we will be reading in due course of deaths caused by individuals completely cut off by this short sighted profit only focused urbanite based view of what is necessary in order to provide a robust fibre optic fixed line communications network. But of course Ofcom will simply agree to whatever the telecoms industry wants in order to turn a fast buck as that is what Ofcom nearly always does in all of its consultations on telecoms related matters.

With the utterly cavalier disregard for the safety of the general public which it has demonstrated in this consultation Ofcom has once again shown that it is not fit for purpose.

**Question 1: Do you agree that Ofcom's guidance on battery back-up lifetime needs to be reviewed at this time:**

No its previous four hour standby recommendation was already totally inadequate. It is quite unbelievable that this is now to be reduced to one hour. Apparently this is because Ofcom directors only live in Central London and have no experience of the robustness of electricity networks (or the lack thereof) in countryside areas with weather exposed overhead power lines.

**Question 2: Do you agree with the scope of this consultation as set out in Section 4:**

Another typical riddle based Ofcom consultation question. I do not care about the consultation's scope but only about its practical consequence of people dying when they are cut off with fibre optic handsets they cannot use in a major regional or national emergency with prolonged power outages.

**Question 3: Do you agree that a battery backup facility should always be provided:**

Yes and by "always" I expect the battery to last at least 150 hours in standby mode and to provide at least three hours of talk time.

**Question 4: Do you agree that the proposed minimum battery longevity of 1 hour is appropriate:**

No it is absurdly and life threateningly short and is the final indication of Ofcom's total and utter dereliction of its duties to look after the best interests of the British public rather than the value of the share option schemes of the directors of the companies it regulates.

**Question 5: Do you agree with our proposed approach to address the needs of individual customers requiring additional protection:**

No I don't agree with your approach at all. Clearly you don't care one jot if anyone dies as a result of having a fixed line network they cannot communicate on whilst their local mobile phone cell towers are also knocked out by the same power failures.

All you seem to actually care about is that mobile handsets can be turned out as cheaply and shoddily as possible in some sweat shop in China without any decent capabilities of long term standby in the event of a power failure.

This is a huge and quite unacceptable reduction in the safety capability of the fixed line telephone network compared to the present day copper line network.