

Hadams Consultants

Additional comments:

Hadams Consultants is primarily concerned with the resilience aspects discussed in the ACT. We are not, by and large, concerned with broadcasting. It is our opinion that a consistent and transparent report on the communication infrastructure will promote public confidence. However we consider that it is essential that detail of switching nodes and other key points in the network, including shared infrastructure is NOT published.

Question 1: Have we got the scope right? Is the set of networks, services and operators we propose to report on appropriate and is our approach to data gathering and analysis correct?:

Broadly speaking the scope is right. We have some concern regarding the operators listed in annex 7, page 39, both of omission and inclusion. The following providers are omitted: AT & T, Verizon, (both major companies that are members of EC-RRG), Orange, and T-mobile (these mobile operators are major players and are all members of EC-RRG, though we note consolidation in the mobile area). Importantly Airwave has been omitted -this is a key provider of services to the emergency services, and also to other constituents of the Critical National Infrastructure.

Providers that we believe should not be included: the Virgin Media mobile service is provided by t-mobile, also Tesco mobile is provided by O2, there is a danger of double counting if these two providers are included.

Openreach is a special case that should be considered.

Question 2: Do you agree with our approach to classifying different types of networks and services? Are there better ways to define them?:

We agree that the classification of the different types of networks is broadly correct. We would however suggest that Airwave should be included as an additional classification (Airwave is a TETRA network)

Question 3: Do you agree with our proposal to prioritise 2G mobile coverage and broadband speeds for the first report?:

We understand the need to prioritise some areas. We would, however, suggest that coverage of 3G would be a usefull addition.

Question 4: Do you agree with our proposed reference date for the report as a date in June 2011 and are we allowing enough time for the provision of data?:

Yes. This may be a challenge but should be achievable, these major companies will be monitoring the performance of there networks, but will need to edit the reports for public consumption and ensuring the measures are comparable

Question 5: How can we improve the comparability of data between different operators?:

It is essential that any metrics are comparable.

Question 6: Do you agree with our approach for reporting on the use of electromagnetic spectrum?:

No comments

Question 7: Do you agree with our approach to measuring coverage?:

Yes. Using mobile operators current methods is sensible (100x100m is adequate). It must be established that similar granularity is used by all companies. Post code is a (generally) good and consistent method of definition - they will of course vary in geographic area..

Question 8: How do you think we should establish an appropriate level of granularity and the right technical assumptions to make the data useful?:

The granularity mentioned in Q7 answer, above, seems appropriate.

Question 9: Do you agree our proposed approach will enable us to report adequately on arrangements for infrastructure sharing? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?:

Providers should be able report upon infrastructure sharing. However the details may be sensitive, and there may be contractual constraints on sharing information about a third party. Also many companies may use Openreach services but maybe unaware they are sharing the same infrastructure.

Question 10: Do you agree our proposed approach will enable us to report adequately on the provision of wholesale network access? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?:

Yes, we do not believe there should be any significant obstacle to providing this data.

Question 11: How do you currently measure the capacity of the network?:

Not applicable

Question 12: Do you agree that we should define specific metrics for different types of networks?:

Yes, the major difference is between conventional fixed and mobile. Fixed networks can adjust by the physical addition of circuits, but

Question 13: Do you agree with the proposed approach of gathering specific reports of outages above a certain threshold, and how do you think such thresholds should be set?:

Yes.. This will differ between fixed and mobile. For fixed the number of users will be key together with duration. I would suggest 100,000 for a duration of 1 hour as a trigger point. For mobile we would suggest the failure of one MSC for one hour as a trigger point.

The degree of effort required to produce a report will be dependent upon circumstances

Question 14: For smaller outages, which statistical data do you think it is valuable to gather?:

A combination of number of customers disconnected, the length of time of the outage the geographic area affected, related to the total number of lines in that area. It might be useful to use the rules for reporting 999 outages to the emergency services as a starting basis.

This is defined as being required to be reported if:

1. the outage is 30 minutes or more (predicted)
2. the report should be made within 15 minutes of the start of the outage
3. if customers affected are 500 or greater or 50% or greater (which ever is the smaller)
- 4 Reference is made to a standard map.

Note this is a definition related to BT and the geographical areas may be different for other operators.

Question 15: Is a three-month reporting period sufficient to assess availability performance? :

Yes, but exceptional outages should be reported immediately

Question 16: Do you agree with our approach to reporting resilience and emergency planning and the list of data we would ideally collect from CPs?:

Yes. It should be noted that some of this data may be sensitive and should be sanitised before any publication. CPNI will have views on this aspect.

Question 17: Do you already provide information to other organisations and government agencies around resilience issues? If so, what are they?:

Not applicable

Question 18: Do you agree that there are additional networks and services which are of sufficient importance to include in the report? If so, what are they?:

The Airwave network is a separate network and needs to be reported on specifically. As stated above Airwave provides services to providers of CNI in addition to the emergency services. (A user list is managed by Ofcom)

It is less likely that the other examples (finance systems are quoted) should be reported on. The CPNI have produced guidance (initially written for the finance sector) that suggests that it is for the user to specify the level of resilience required and pay for any extra requirements. Unless informed the service provider is unaware of the importance of the services carried.

Question 19: Are there other sources of international data which we should consider? Are we focusing on the right networks and metrics? In particular, have we got the right metric for commenting on next-generation access deployments?:

The sources suggested seem appropriate. In addition it would seem sensible to agree with other EU states to develop common metrics. This will require extensive discussion between the governments and regulators of the various states.