

**Organisation (if applicable):**

BT

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

We would like to highlight that the language referring to network security within the consultation can be confusing, as it becomes easily conflated with other issues of security and we would recommend using terms such as network resilience or availability instead.

**Question 1: What are your views on emerging and potential future security and availability risks and whether they should be addressed in the revised guidance?:**

**Question 2: In relation to the obligations to manage general security risks, how should our guidance be revised to reflect issues such as ENISA's Guidelines on security controls, supply chain management, the use of 3rd party data centres and applicability to smaller CPs?:**

We believe that Ofcom should encourage CPs to refer to industry best practice where applicable, e.g. ISO22301, ISO28000 etc.

**Question 3: How best can risks to end users be considered by CPs and appropriate security information be made available?:**

We do not believe that the discussion around data publication is germane to the context of this guidance and is probably better discussed in the context of end user transparency of services.

**Question 4: Should Ofcom consider additional guidance in relation to network availability and the provision of related consumer information?:**

We do not believe that the discussion around data publication is germane to the context of this guidance and is probably better discussed in the context of end user transparency of services.

**Question 5: Would it be useful to clarify our expectations around reporting in the case of wholesale and 'over the top' arrangements, and the need for CPs to maintain sufficient fault monitoring?:**

Regarding end user "over the top" reporting, BT has concerns about flagging incidents that may be impacting other CPs but not our own customers. There may be a risk of "wrong" reporting, which could leave BT exposed. BT is of the opinion that responsibility for reporting lies with the affected CP.

BT welcomes clarification around the need for fault monitoring and we would be happy to discuss as the process continues.

**Question 6: What are your views on the appropriate thresholds for reporting incidents affecting consumers of smaller CPs, mobile networks, data services and services suffering partial failures?:**

Regarding the introduction of new thresholds for Broadband services, aligned to Voice thresholds, BT would only be satisfied with this if the threshold levels are significantly increased. The service thresholds that ENISA require to be reported are much higher than Ofcom's thresholds. We would suggest Ofcom's thresholds are currently too low to be of real value.

BT agrees that more guidance is needed around what should be reported. In our view reporting should focus on impact on "service" (e.g. broadband) rather than on end users' use of individual applications (e.g. e-mail). We would strongly advise Ofcom to guard against a system of over-reporting, e.g. when Broadband is still working, albeit more slowly than normal.

We would advise against lowering absolute thresholds and would agree with the approach to have relative thresholds for smaller CPs. BT would suggest that Ofcom consider raising absolute thresholds to a more useful level.

We would be happy to discuss these points further as the process continues.

**Question 7: What are your views on revising the current process for reporting significant incidents?:**

BT supports the use of NEAT for reporting major incidents that impact society or other CPs. We also have a real-time reporting process in place that has satisfied Ofcom to date.

BT would be concerned that the creation of a mandatory template may add significant cost to our reporting. Should such a template be proposed, we would like to work with Ofcom to minimise the diversion of scarce network management resource to create the reports. BT acknowledges that this information is of use to Ofcom, but we are concerned that the thresholds for reporting are so much lower than the ENISA guidelines, leading to many more reportable incidents than required by Article 13.

Email is our preferred method of reporting.

We would be happy to discuss these points further as the process continues.