

Your response

Questions concerning the Proposed changes to Ofcom's NIS Guidance focusing on Incident Reporting Thresholds for the digital infrastructure subsector

Question	Your response
<p>Question 1: Do you agree or disagree with our proposed new incident reporting thresholds? Please set out your reasons, with supporting evidence, for your response.</p>	<p>We have been designated as an Operator of Essential Services under the NIS Regulations 2018. In principle we agree incidents which would not meet the current reporting thresholds could result in significant service degradation. Therefore a reduction (or amendment) of the reportable thresholds, at least insofar as they apply to Nominet's operation of the .UK domain name and associated DNS services, is reasonable.</p> <p>However we have some concerns about the lack of clarity and potential for redundant notifications which might result from the proposed thresholds set out in the consultation.</p> <p>Firstly the use of queries per day does not seem appropriate when looking at service performance over a 15 minute time period. We do not understand the proposal to move away from queries per second.</p> <p>Secondly when it comes to measuring available capacity, our DNS services operate with very high levels of inherent redundancy >99% (to absorb DDOS attacks without any impact on performance for example). So a reduction in capacity of 25% as proposed may well not actually result in a significant service degradation. A capacity reduction resulting from planned systems maintenance and which does not adversely impact users should not require any notification to Ofcom.</p> <p>There are a number of options in which service degradation could be monitored, and reported if a threshold was exceeded. We would welcome the opportunity to include some of our technical experts in a joint discussion about appropriate thresholds.</p> <p>Confidential? – N</p>

Question 2: Do you have any other comments on our proposed new incident reporting thresholds?

Confidential? – N

Please complete this form in full and return to nisconsultation@ofcom.org.uk.