

## Your response

Questions concerning Ofcom's draft general statement of policy under section 105Y of the Communications Act 2003 (see Annex A5).

Question	Your response
Consultation question 1: Do you have any comments on our proposed approach to compliance monitoring?	<p><i>Is this response confidential? –N</i></p> <p><i>The collaborative approach is welcome, as well as using the tiering system to gauge this. However, the elephant in the room for all tier 2&amp;3 vendors is the (yet to be clarified) indications that if a lower tier vendor supplies services to a higher tier vendor they will be expected to operate at that high tier level. If this is the case the financial, operational and timings placed on smaller vendors would be untenable.</i></p> <p><i>For example the organisation I am responding for would be Tier3 based on turnover, but we provide services via a wholesale agreement, to a Tier1 vendor.</i></p> <p>This needs urgent clarification.</p>
Consultation question 2: Do you have any comments on our proposed approach to testing?	<p><i>It seems quite straight forward, but again, if a tier 3 organisation is pulled up into Tier 2 or 1, then they may not have the organisation competencies to run a full TBEST exercise.</i></p>
Consultation question 3: Do you have any comments on our proposed approach to enforcement?	<p><i>No comments</i></p>
Consultation question 4: Do you have any comments on our proposed approach to reporting security compromises?	<p><i>This section seems to presuppose that a provider is supplying services to end users. Advice to wholesale AltNets would be useful here, where the network provider, delivers a transport layer service to a CP who then delivers end customer services via this route.</i></p>

<b>Consultation question 5: Do you have any comments on our proposed approach to information sharing?</b>	<i>No comments</i>
<b>Consultation question 6: Do you have any other comments on our draft statement of general policy set out at Annex A5 to this consultation?</b>	<i>Just to reiterate the point about tiering and smaller providers being pulled up. The industry really needs very clear guidance on this ASAP.</i>

Questions concerning Ofcom's draft guidance on resilience requirements in sections 105A to D of the Communications Act 2003 (see Annex A6).

<b>Question</b>	<b>Your response</b>
<b>Consultation question 7: Do you have any comments on our proposed approach to resilience set out in section 4 of the draft guidance at Annex A6 to this consultation?</b>	<i>Is this response confidential? –N</i>  <i>No comments</i>
<b>Consultation question 8: Do you have any comments on our proposed resilience guidance set out in section 5 of the draft guidance at Annex A6 to this consultation?</b>	<i>No comments</i>
<b>Consultation question 9: Do you have any other comments on our draft guidance set out at Annex A6 to this consultation?</b>	<i>No comments</i>