

Proposed guidance consultation

Question	Your response
Question 1: Do you consider the measures in the proposed guidance relating to the resilience of the physical infrastructure domains to be appropriate and proportionate?	No
Question 2: Do you consider the measures in the proposed guidance relating to the resilience at the Control Plane to be appropriate and proportionate?	
Question 3: Do you consider the measures in the proposed guidance relating to the resilience of the Management Plane to be appropriate and proportionate?	
Question 4: Do you consider the measures in the proposed guidance relating to communications providers' own managed services to be appropriate and proportionate?	
Question 5: Do you consider the measures in the proposed guidance relating to communications providers' arrangements for preparing for adequate process, skills and training to be appropriate and proportionate?	

Call for Input

Question	Your response
CFI question 1: Does this framework accurately capture the factors relevant to assessing what is an appropriate and proportionate measure for MNOs to take with regards to power resilience for RAN cell sites?	Confidential? – Y / N

Question

Your response

CFI question 2: Do you agree that at a minimum MNO's networks should be able to operationally withstand short term power-related incidents?

CFI question 3: What mobile services should consumers be able to expect during a power outage, what consumer harms should power backup up focus on mitigating and does this vary depending on the type or duration of the outage?

CFI question 4: What technical choices are available to MNOs to reduce power consumption, and should be considered as part of assessment of appropriate and proportionate measures?

CFI question 5: How many sites would it be feasible to upgrade and maintain and why?

CFI question 6: Do you consider that providing a minimum of 1 hr backup to all RAN cell sites would be proportionate to meet the security duties under s.105A to D of the Communications Act 2003?

No. Here in Shetland we had a widespread power outage that, for many people, lasted for almost a week. If people are being forced onto VOIP and that will be unavailable when there is no power, it is vital that the mobile network is available throughout the wider power outage. Whilst this power outage happened, many properties were cut off by snow at the same time. The mobile network will become the only means of calling the emergency services.

CFI question 7: What cost effective solutions do you consider could meet consumers' needs during a power outage?

CFI question 8:

a) Is it more cost efficient to increase power backup up to any space, weight, or planning limitations, i.e., increasing power backup as much as is feasible provides the lowest £ per hour?

b) do the benefits of any power backup solution have diminishing returns, i.e., the benefit per hour decreases as you increase the amount of power backup?

Question**Your response**

CFI question 9: Does the mobile market fail to capture the value or importance of power backup, and if so, why?

CFI question 10: Should improvements in power backup be focused on solutions at sites which are identified as higher risk of outages?

CFI question 11: Why would any requirement lower than a minimum of 1 hour be sufficient in future? What duration do you consider would be sufficient and why?

The service must not be impacted by a wider power outage. It will become the lifeline for many households when people are forced onto VOIP.

CFI question 12: Over what time period could industry make upgrades to provide a minimum of 1 hour at every cell site or other cost-effective solutions to address potential consumer harm?

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