Consultation response form

Consultation title	**Proposed Guidance on protecting access to emergency organisations when there is a power cut at the customer's premises: Proposals for guidance on General Condition A3.2(b)**
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Representing (delete as appropriate)	Self
Organisation name	
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We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Do you agree with the four proposed principles? If not, please give reasons. Please set out your comments on each of the principles separately.	No The consultation does not provide sufficient resilience to protect people during extended outages of power. With the changes in technology and the increased use of devices requiring power reduces their protection and may increase the possibility of a loss of life.

CPs should have at least one solution that enables access to emergency organisation for a minimum of one hour in the event of a power outage in the premises.

Ref 3.8
One hour is insufficient. Whole neighbourhoods may be dependent on the same power supply and may all have their broadband provided without a copper direct exchange line. If the outage is greater than one hour, then alternatives such as neighbours will also not be available.

Ref 3.9

The minimum should be more realistically 24 or even 48 hours.

The assumption that mobiles will be the alternative during power outages is flawed as:
• Most personal devices will lose charge within hours.
• Not all areas are fully covered with good indoors mobile reception.

The assumption that there will be a correlation between emergency calls and power outage may be true as people seek to ascertain the status, however the one hour minimum does not consider BAU emergency call types during any extended outage. Effectively a person in an emergency may be isolated and there would be delay in finding someone able to call the emergency service.

Ref: 3.10
This should include recognition that certain individuals need to be contactable during civil emergency which includes catastrophic local power failure. If bad weather or exceptional circumstance means that the power outage is extended for a few days then specific individual's such as Doctors, Police Officers, officials etc need to be contactable.
If the outage is longer than several days, then Broadband Services provided via nodes (such as cabinets) and Mobile masts that are dependent on power will start to fail as their UPS drain.

Ref: 3.11
CPs should communicate clearly to their customers that where telephony is dependent on local power such as broadband routers, VoIP and cordless phones that the customer should consider protecting these devices on a UPS and if necessary solar or generator backup. Customers generally can then determine the service risk and those in remote locations consider the wider issues.
Note: the majority of houses fitted with Solar panels in the UK turn off during power outage for safety reasons. Power outage protection requires an approved battery backup solution.

Ref: 3.14
This contingency requirement and its cost should not necessarily fall on the CP however Ofcom needs to consider carefully the change to communications that are dependent on local power.
In particular the CP should clearly communicate the difference between their broadband and telephony offerings. Those dependant on power supply within the distribution network are more vulnerable than those with full fibre with passive optical couplers. Note that some FTTP providers still use powered devices in their distribution network.

The solution should be suitable for customers' needs and should be offered free of charge to those who are at risk as they are dependent on their landline

Ref 3.18
CPs should be responsible for the first 24 hours.

Ref: 3.21
Customers requiring greater than 24 hours should be guided to what steps they can take at their cost.

Ref: 3.23
Restricted solution to 24 hours

Ref: 3.28 and 3.36
For those specifically dependant on protection from power outages (or those that simply choose) should be able to request a CP who currently provides a direct exchange line offering (CORDED TELEPHONE POWERED BY THE EXCHANGE) to continue that service.

CPs should i) take steps to identify at risk customers and ii) engage in effective communications to ensure all customers understand the risk and eligibility criteria and can request a protection solution

Users should not be forced to adopt complex or power dependent items merely to provide alternative telephony functionality. Such as imposing broadband techniques and VoIP.

Users that have specific devices such as personal alarms for the disabled should continue to work without issue.

Mobile is not an effective solution if the outage is greater than a few hours. Devices lose their charge.

Some people with dementia or simply old age may become confused and therefore need to be able to locate a telephone in an emergency. Fixed telephones at set known locations such as the lounge or bedroom. Mobiles are often misplaced and are likely to be in various state of charge.

CPs should have a process to ensure that customers who move to a new house or whose circumstances change in some other way are aware of the risk and protection solutions available.

Ref 3.53
Not only should this be included in all installation and user guidance the relevant resilience and reliability of the solution should be clearly visible in advertising either for the telephony solution or any dependency on other bundled product such as broadband.

Ref: 3.55
Users selecting a provider should be able to compare such resilience in choosing options utilising different technology.

Ref: 3.56
This should include estimated power consumption and required capacity required of a

UPS or equivalent.

General Comment on the Consultation

CPs should provide clear information regarding the resilience of their networks. This will include power resilience at central data centre, network hubs, distribution nodes (e.g cabinets). The customer dependency on power and its solution cannot be considered in isolation.

The current PSTN provided by BT and KCOM is provided by Telephone Exchanges and Switching Centres. These are powered from batteries that are under charge. Under power outage these are backed up by generators fuelled from contingency tanks. The exchange line (50v) provides approx. 12v supply to a corded telephone. Under these circumstances resilience is very high to all subscribers. In emergencies priority selection can ensure nominated individuals can have service maintained.

As CPs move to broadband then telephony can move to piggy backed VoIP. However, to maintain service the power must be maintained at the central network establishments, any powered items within the distribution network and the relevant items at the customers premises (router/modem, telephones). Customers (or individuals requiring resilience to power outage) can protect themselves by installing UPS/Battery backup to key items but this resilience depends on the ISP protecting their network to the same timescales. Therefore, if a customer provides facilities to protect up to 14 days then it will not be known what the guaranteed resilience is for the product chosen.

- • ADSL/ADSL+
- • FTTC
- • VM VIVID
- • VM VROOM
- • FTTP (with powered nodes)
- • FTTP (with passive optical couplers)

CPs should be required to provide a minimum network resilience (set by Ofcom) to power outage for each product and should clearly communicate the resilience planned

General Comment Regarding Resilience of Society During Disaster

There appears to be no criteria within the consultation relating to civil emergency or disaster whether due to nature, devastating incident, terrorism or other.

Ofcom on behalf of the UK Government should be ensuring the collective resilience of all communication solutions in use are able to support civil emergency situations and that the increased use of powered devices large populations of people could potentially to be without communication of any kind in a situation of a catastrophic loss of local power over a large geographical area.

Whilst any such scenario is very very unlikely it is possible that an incident could occur that could devastate national grid infrastructure in a way that normal BAU repair will be inadequate. To be clear in its extreme I am referring to a scenario like a plane crashing on a main power station or severe weather affecting high capacity pylon routes. If an

outage lasted more than several days all communication based on power including network centres, street-based equipment (including mobile masts) will be out. Garages no longer have manual pumps so there will be also be fuel shortage for generators.

General Comment Regarding Telephony Access to the Emergency Services

This consultation appears to only apply a very minimal requirement on the maintenance of telephony service for emergency calls and only for one hour. In addition, the consultation does not include or refer to the power resilience of the actual communication networks and products provided by the CPs.

There is also too much reliance on mobile network as an alternative. The resilience of the mobile service, its capacity and the practical issues of finding a charged phone may cause delays in an emergency.

Surely it is the responsibility of Government to protect its people and avoid loss of life. The current requirements do not appear to meet this whether the outage is short term (few hours), medium term (2/3 days) or long term (over several days). People will require assistance of the emergency services in any of these situations.