

FCS Response to Consultation on Ofcom's draft general policy under s105Y of the Communications Act 2003 (Ofcom's procedural guidance)

About FCS

The Federation of Communication Services (FCS) represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. Some FCS members also have some consumer customers. FCS is the largest trade organisation in the professional communications arena, representing the interests of around 350 businesses, which supply B2B services nationwide.

FCS members are generally smaller providers with revenues below £50million and so are likely to be in the Tier 3 category. They often have very little network as they mainly resell services from wholesalers. A further characteristic of these suppliers is that they are at the end of a long supply chain – a complex supply chain, which is characterised by a series of suppliers (wholesalers) each adding value and functionality before selling to a reseller. Quite often the reseller has little visibility or control of any activities further up the supply chain. As such they will also have less expertise and resource in areas such as security and so any additional guidance on what smaller organisations need to do to keep safe would be very welcome.

Comments

FCS welcomes the opportunity to comment on the Consultation on Ofcom's draft general policy under s105Y of the Communications Act 2003 (Ofcom's procedural guidance) (the 'Consultation'). Maintaining a robust and secure communications infrastructure is essential for the security of the UK.

The changes Ofcom is proposing to make in the Consultation to the policy are based on Ofcom's learning from the operation of the current policy and are proportionate to the issues it has identified. FCS broadly welcomes the proposed changes to the Statement of Policy. We consider that the tiering system for monitoring remains proportionate as a Tier 3 provider can be brought in scope when supplying 'key' or important services but are otherwise free from supervision. Many of FCS members will be in the Tier 3 Category.

We were disappointed to read in Section A2.17 that communications providers have informed Ofcom that they do not differentiate between urban and rural cell sites, so adding a rural criterion will likely involve capital expenditure. Understanding the nature of an area (rural or urban) must surely be essential to determining if the correct measures are in place. We would expect this mapping to be relatively straight forward and so would not expect to be disproportionate burden given the importance of rural coverage and the impact on these users.