

Your response

Question	Your response
General Notes about Response Organisation's Role	Confidential? – N The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff. In our response to this consultation, we would like to reiterate our advisory remit, as it extends to Scotland, and we will therefore concentrate on those areas that we believe are of particular interest and importance to Scottish consumers, citizens, and businesses. We have set out our rationale and suggested additions/amendments below. It should be noted that where we have chosen not to supply a response to a particular question it is because we deem that there is no uniquely Scottish dimension to our response and / or that the question relates to topics that are outside of the capacity of the ACS to respond.
Question 1: Do you have any comments on our proposed updates to our guidance on compliance monitoring?	Confidential? N The ACS offers no comments on this question.
Question 2: Do you have any comments on our proposed updates to our guidance on testing?	Confidential? N The ACS offers no comments on this question.
Question 3: Do you have any comments about our proposed changes to our security incident reporting thresholds and criteria, as described in paragraphs 3.19 to 3.48?	Confidential? – Y / N The ACS supports the proposed changes to the incident reporting thresholds and criteria. It especially welcomes: • Direct contact with affected users when the user has opted to receive service-related information AND the user can be geolocated (by the CP) to “often” use the cell and / or service that is subject to the security compromise. The ACS acknowledges that the latter may be technologically challenging to implement but suggests that users’ contract address details could be used as a

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	first-order approximation as to who typically relies on the cell/service affected. Cumulative impact. It would be helpful for the CPs, in contacting users affected, to include a rolling aggregated summary of all service security compromises for the specific cell over the prior 12-month period. This would enable users to make informed decisions about staying with their present CP or moving to a new CP (where such competing services are available). It is less helpful for consumers to have to engage with Ofcom to find out about the reliability of a particular CP service, and to wait 12 months between updates. Reporting thresholds – number of customers affected. The reduction in thresholds for reporting security compromises is welcome. However, in a rural context, it is difficult to determine whether the threshold number of users per cell site(s) affected (if $\geq 10,000$ customers) is representative of the rural “situation” in Scotland, and as such, whether this reporting threshold – based on customer numbers – is likely to be exceeded: thus triggering an incident report. Reporting thresholds – rural coverage. What is particularly welcome is the requirement to report incidents when a single rural cell site is affected – defined when the postcode of the physical location of the impacted cell site matches a postcode in Ofcom’s rural dataset. It should be noted, however, that the ACS is aware of cell sites in Scotland that are not categorised as “rural” or “most rural” in the dataset but are the single (and often the only) cell site for many customers. A known example is the postcode PH11 covering Glenshee and Glenisla. Many of the inhabitants of Glenisla are served by a single cell site located on a hill summit (744m elevation). There is no overlapping cell coverage from the principal CP. However, in this real example, security compromises of this cell would not require the CP to report an incident to Ofcom based on a single cell serving a “rural” location (as the postcode is not deemed “rural”. Continuing with this

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	geolocation example, the region also does not benefit from any form of gigabit fixed connectivity. To overcome the compounding issue of non-resilient mobile connection (single cell) AND lack of fixed line gigabit comms systems, many local residents have had to resort to a LEO satellite solution at a cost substantially higher than equivalent terrestrial solutions. The ACS would suggest that Ofcom investigates the veracity of the postcode dataset in order to determine whether it is fit-for-purpose in Scotland.
Question 4: Do you have any comments about the proposed changes to our reporting templates?	Confidential? N The ACS offers no comments on this question.
Question 5: (for MNOs): Do you have any comments about the requirement to provide us with a list of your RAN cells for purposes of mapping incidents and their impact?	Confidential? N The ACS welcomes the proposed requirement for MNOs to provide location data for the RAN cell locations that are affected and reported in their incident reports. The inclusion of such data should better enable the ACS both to visualise and to enable a more accurate and quantitative assessment of the CUMULATIVE impact that security compromises have on rural geographical communities in Scotland.

Please tell us how you came across this consultation.

- ☒ Email from Ofcom
- ☐ ~~Saw it on social media~~
- ☐ ~~Found it on Ofcom's website~~
- ☐ ~~Found it on another website~~
- ☐ ~~Heard about it on TV or radio~~
- ☐ ~~Read about it in a newspaper or magazine~~
- ☐ ~~Heard about it at an event~~
- ☐ ~~Somebody told me or shared it with me~~
- ☐ ~~Other (please specify)~~

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