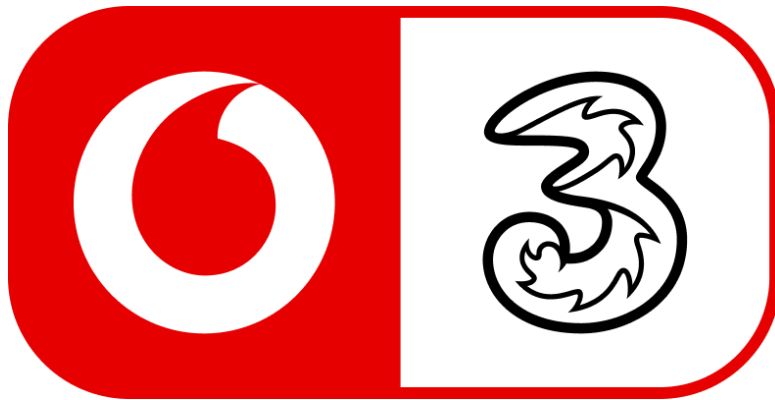
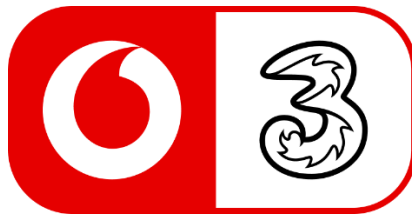




Response to Ofcom's Consultation:

**Proposals to update Ofcom's General Statement of
Policy under section 105Y of the Communications Act
2003**

4 August 2026
Non Confidential



Introducing VodafoneThree

At the beginning of June 2025, Vodafone UK and Three UK merged to become VodafoneThree. The merger signals the start of an exciting new chapter in UK communications, allowing citizens and consumers to benefit from a market leading new company that has the scale, resources and the innovative spirit to deliver game changing connectivity.

A new era of connectivity

The merger signals not just a transition towards material enhancements in the UK's mobile coverage, but it will create more opportunities for more customers to benefit from competitively priced, quality business connectivity and broadband services.

Connecting every community

Our investment will boost speeds for every customer as we bring 5G Standalone to every corner of the UK by 2034. From busy city centres to remote rural towns, we're making sure every area has the access it needs, including the most vulnerable within society.

To find out more about VodafoneThree, our brands and how we are building the UK's best network, visit: <https://vodafoneandthree.uk/>

Executive Summary

VodafoneThree welcomes the opportunity to respond to Ofcom's consultation on its draft general statement of policy under s105Y of the Communications Act 2003 (Ofcom's procedural guidance).

In line with its long-standing commitment to increasing the resilience and security of the UK's communication networks, VodafoneThree supports the objectives behind Ofcom's proposed changes to its procedural guidance. We agree that, in light of Ofcom's practical experience operating its Statement of Policy for the past three years, changes to Ofcom's guidance may be beneficial to further improve the quality and consistency of incident reports and to evolve Ofcom's approach to supervising providers' compliance with their security obligations.

Nonetheless, in the increasingly complex regulatory environment in which VodafoneThree operates, we are mindful of the need to ensure that Ofcom's exercise of its supervisory powers remains focused, proportionate and effective. We therefore set out below our comments on the detail of Ofcom's proposals, which we hope will provide for a constructive dialogue between industry and Ofcom.

Our key concerns may be summarised as follows:

- **Proportionality and regulatory burden:** While VodafoneThree supports Ofcom's objective of improving resilience and security oversight, several proposals risk imposing significant operational, technical and cost burdens without clear evidence that they will deliver corresponding resilience or consumer benefits.
- **Reporting thresholds are often set too low and rely on inappropriate metrics:** A number of the proposed thresholds would capture routine operational incidents rather than genuinely significant security compromises. We are particularly concerned by Ofcom's reliance on cell-site level reporting, rather than metrics that more accurately reflect real customer impact.
- **The proposed rural reporting framework is impractical and inconsistent with existing regulatory requirements:** Ofcom's introduction of a new methodology for defining "rural" areas creates unnecessary complexity, duplicates existing "rurality" frameworks within VodafoneThree's licence obligations and would require substantial investment to implement.
- **Several proposals lack clarity and legal certainty:** Key concepts, including "same area", "significant incident", aspects of the critical incident criteria, severe weather aggregation and pre-positioning compromises, are insufficiently defined and risk driving defensive over-reporting.
- **Ofcom should provide greater transparency around its supervisory powers:** The expanded use of assessment notices should be accompanied by clear criteria, appropriate safeguards and meaningful opportunities for providers to engage before intrusive information gathering or testing activities are undertaken.
- **The cumulative impact of the proposals has been underestimated:** The consultation does not adequately account for the systems development, contractual changes, implementation costs and ongoing resource requirements needed to comply with the proposed reporting and data submission obligations.

- **Further industry engagement and a reasonable implementation period are essential:**
Given the ambiguity surrounding several of the proposals and the scale of the changes required, Ofcom should: i) engage further with industry before finalising its proposals; and ii) afford providers an appropriate implementation period to amend contracts, develop, test and deploy compliant solutions and make associated adjustments to internal business processes. As explored more fully below, VodafoneThree estimates that an implementation period of [CONFIDENTIAL REDACT] months is required to deliver the necessary changes.

Question 1: Do you have any comments on our proposed updates to our guidance on compliance monitoring?

VodafoneThree supports Ofcom's intention to move towards a more proportionate, risk-led supervisory model. We nonetheless wish to comment on Ofcom's proposed increased use of assessment notices as a more standard element of its supervisory approach.

While Ofcom considers that the use of assessment notices for firsthand assessments could enable Ofcom to perform its duties "*in less time, and with less burden on the relevant communications provider*", it is not possible for VodafoneThree to comment on the extent to which this proposal would result in a reduced burden for its teams (pending any insight into the range and frequency with which they will be used). While our experience suggests that it can be mutually beneficial to engage through focused, face-to-face interactions, these processes can easily become intrusive and burdensome.

VodafoneThree conducts frequent largescale testing in support of (among other things) the operation of the network, the launch of new products and services, and resilience and security programmes. These testing cycles are carefully scheduled and managed. If Ofcom opts to make increasing use of assessment notices to requirement mandatory on-site testing, the impact of such testing would need to be factored into this schedule. Failure to do so would have an unreasonable impact on VodafoneThree's business, given it could disrupt the testing required to launch new products and services and keep the network secure. Furthermore, we anticipate that the use of assessment notices to require additional mandatory on-site testing would be costly for providers to undertake, given that VodafoneThree [CONFIDENTIAL REDACT].

We consider that Ofcom should conduct a thorough impact assessment of this proposal, including the cost associated with the testing Ofcom may mandate. We would also welcome the introduction of clear and transparent criteria indicating when Ofcom will opt to use an assessment notice (as opposed to an information notice or section 105I direction). In addition, we would be grateful for confirmation as to (i) what steps Ofcom will take in order to satisfy itself that any use of an assessment notice is appropriate; and (ii) whether providers will be granted an opportunity to respond through correspondence or an information notice first.

Given the competing demands on VodafoneThree's resources and time and to avoid disrupting VodafoneThree's operations at short notice, we ask that Ofcom provide a forward-looking timetable setting out its plan for the information gathering and other supervisory activities it intends to undertake over the next financial year. This applies to all supervisory activities

associated with assessment notices (such as staff interviews, site visits and inspections) but is especially important for mandatory on-site testing, due to the impact on VodafoneThree's existing testing cycles (security and operational) and planned product launches which would occur if VodafoneThree is not able to agree the dates of on-site tests with sufficient notice.

Finally, VodafoneThree is grateful for Ofcom's acknowledgement that in all cases, the use of relevant powers will be subject to consideration of what is proportionate in the circumstances. We note that the use of firsthand assessments made through an assessment notice should only occur where proportionate and in a specific, targeted way, to avoid unduly burdening the provider. In addition, while we welcome Ofcom's proposal to share draft assessment notices for comment, in line with other regulatory regimes, we consider this should become standard practice and that providers should be both: (i) provided draft assessment notices in advance; and (ii) granted sufficient time to consider the draft assessment notice once issued.

Question 2: Do you have any comments on our proposed updates to our guidance on testing?

VodafoneThree notes that Ofcom is proposing to reduce the length of the testing section of its guidance and to direct providers to the Code for guidance on testing under the security framework and to the TBEST handbook for guidance on our voluntary testing programme. Provided these changes simplify and clarify Ofcom's guidance on testing, we support these amendments. However, pending clarity of the exact wording proposed to be changed by Ofcom, it is not possible to comment properly.

VodafoneThree embraces testing as part of both its standard operating procedures and its long-standing commitment to resilience. Any additional testing (above and beyond the thorough and frequent testing VodafoneThree conducts of its own accord) can be expensive and consume a large amount of time and resources which are required on other projects to maintain and continually upgrade the network. We consider it critical that Ofcom should not mandate TBEST to be followed (either directly or indirectly through increased use of assessment notices against providers who do not voluntarily participate in TBEST testing) in circumstances where providers already carry out appropriate testing. We note that while TBEST may be appropriate for certain providers, its appropriateness differs between providers depending on factors such as their network architecture, risk profile, organisational scale and existing assurance frameworks.

In view of the above, we would be grateful for Ofcom's clear confirmation that:

- Participation in TBEST is genuinely voluntary;
- Non-participation alone will not increase the likelihood of an assessment notice being issued; and
- Equivalent, comparable first- or third-party testing mechanisms will be given equal weight when assessing whether further testing is required.

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?

VodafoneThree is supportive of moving towards a single, consistent reporting framework. However, we have significant concerns about the proposed reporting thresholds, reporting burden and practical operability of several of Ofcom's proposals. VodafoneThree's greatest concerns relate to:

- The proposed universal criteria thresholds and metrics;
- The rural single cell-site threshold;
- The cell-site (urban and semi-urban) thresholds;
- The critical threshold;
- The catch-all "significant incident" test;
- The linked "severe weather" incidents test;
- The increase in the volume and burden of monthly bulk reporting; and
- The pre-positioning security compromise reporting obligation.

The proposed universal criteria thresholds and metrics

VodafoneThree is concerned that the proposed universal criteria set out in 'Table 2 - Mobile network numerical thresholds' are neither practical nor proportionate. First, the proposed mobile network numerical thresholds are framed in terms of the number of end-customers / cell sites affected. [CONFIDENTIAL REDACT].

By way of example only, an incident causing 10,000 failed call attempts may affect only 3,000 end-customers, depending on the number of times each customer attempts to use the network in their daily lives, and the extent to which they repeatedly try to make a call once their first attempt had failed. Accordingly, VodafoneThree's view remains that other metrics provide a more accurate estimate of the true impact on the end-customer.

In addition, we further note that the thresholds set out in Table 2 are purportedly intended to align on a universal criterion for a "Major Service Failure". Insofar as Ofcom intends that the triggering of these thresholds would lead to a 3-hour reporting obligation, VodafoneThree considers several of these thresholds to be far too low. However, we assume that Ofcom's intention is that the thresholds set out in Table 2 define a reportable security compromise, and that the applicable reporting timeline will depend on whether the compromise constitutes a "Critical, Major or Moderate" incident, following the guidance set out in Table 5 and paragraph 5.28 of the Draft Revised General Statement of Policy. We provide our comments on the proposed thresholds on this basis below.

≥10,000 customers or ≥25% of customer base

An incident affecting ≥10,000 customers for ≥8 hours would affect *significantly* under 1% of VodafoneThree's customer base. It would, therefore, render the alternative ≥25% of customer base threshold entirely meaningless, insofar as a reporting obligation would always be triggered by the 10,000-customer threshold first. An incident of this magnitude would currently be

classified as a P5 incident under VodafoneThree's existing incident management processes. Indeed, any incident involving $\leq 30,000$ failed call attempts or data subscribers would not be treated as a "Major Incident" in line with VodafoneThree's existing incident management processes. An incident involving $\leq 10,000$ failed call attempts would already be reported to Ofcom as part of a bulk monthly report under current incident management processes, and it is therefore unclear why this threshold has been selected to constitute a "Reportable security compromise".

$\geq 100,000$ customers

As to Ofcom's proposed introduction of a threshold of $\geq 100,000$ customers affected by a loss of service or major disruption for any duration, VodafoneThree agrees that this is a proportionate threshold, save that it repeats its concerns over the use of affected 'end customers' as opposed to number of failed voice call attempts or data sessions and considers the latter metrics should be applied. VodafoneThree notes that it currently already reports on incidents involving 100,000 failed voice attempts.

≥ 25 cell sites

VodafoneThree notes that an incident affecting ≥ 25 cell sites for ≥ 2 hours may have little or no impact on customers' use of the network, given the extremely high number of cell sites in the UK and overlapping coverage by multiple cell sites. On the assumption that Ofcom intends that an incident affecting ≤ 25 sites should be a Moderate security compromise, requiring a monthly bulk report notification only, we agree with this proposal. It is unclear whether Ofcom envisages that the 25 cell site threshold would be triggered when 25 cell sites fail across the entire network operated by VodafoneThree, or only if 25 cell sites fail within the "same area" (as to which, please see our commentary on the proposed cell site (urban and semi-urban) thresholds below).

≥ 150 cell sites

Vodafone does not currently have any objections to the introduction of a > 150 cell site reporting threshold.

The rural single cell-site threshold

Introduction

VodafoneThree notes with concern that Ofcom appears to envisage that incidents will be classified as a "Reportable security compromise" if a single cell site which exists within a postcode in Ofcom's rural dataset is affected for ≤ 8 hours. At the outset, we note that the Network Commitment in VodafoneThree's licence already defines "Rural" in accordance with a Bluewave classification (see section 8A(1)(o) of VodafoneThree's Public Wireless Network Licence dated 10 April 2026). We are concerned that Ofcom's proposed changes introduce a new definitional

framework for “rurality” based on Office of National Statistics (and associated body) surveys, despite a definition of “rurality” already existing.

As Ofcom is aware, the definition of “Rural” within VodafoneThree’s licence was drafted by Ofcom itself, and we understand that it aligns with the definition used by Ofcom for other policy initiatives, such as Ofcom’s methodology for the Telecoms Access Review and assessment of the “digital divide”. It is therefore unclear to us why Ofcom has opted to introduce a new framework for rurality. We would prefer that Ofcom use the existing definition under VodafoneThree’s licence, to avoid requiring VodafoneThree to undertake and maintain two simultaneous mapping exercises, which we consider to be disproportionate.

In addition, putting this fundamental issue to one side, Ofcom's rural dataset contains an enormous number of postcodes, and it would be technically challenging to map this dataset to VodafoneThree's own cell sites and monitor disruption at this low level. Furthermore, the effect of this proposal would significantly increase the bulk and volume of the monthly bulk reporting process, increasing the regulatory burden on VodafoneThree's teams. We consider this to be disproportionate. Moreover, while we agree that the activities of customers in rural areas may be affected to a greater extent by a given impact on the operation of the network or service, it is not clear why Ofcom requires information at this granular level.

Ofcom’s proposals would require further investment

[CONFIDENTIAL REDACT] especially if Ofcom envisages that operators should map their cell sites against its vast rural postcodes dataset. The cost and work required to develop these capabilities appear to be under-estimated in Ofcom’s impact assessment at paragraphs A2.17- A2.18 of the Consultation and we do not agree with the conclusions Ofcom draws. These costs are particularly disproportionate in circumstances where, as we have explained above, VodafoneThree’s Network Commitment under its licence already contains “rural” designations following a different methodology.

Ofcom’s methodology appears flawed

As we have explained above, we are concerned that Ofcom has introduced a new methodology for assessing rurality, notwithstanding an existing process for designating areas as “rural” already existing under VodafoneThree’s Network Commitment. If Ofcom is minded to publish further guidance on treatment of rural areas, then the definition of rural used in VodafoneThree’s licence should be adopted.

Nonetheless and for completeness, VodafoneThree is concerned that Ofcom’s rural postcodes dataset contains, on any reading, a vast number of postcodes. Despite Ofcom’s attempt to explain how it has defined a rural area at paragraph 3.35 and Annex 1 to the Consultation, the precise methodology used remains unclear and Ofcom appears to have combined different methodologies and studies which took place at various points in time and may no longer provide

accurate insights into either (i) rurality; or (ii) cell site coverage. Before Ofcom proceeds with any implementation, we would therefore be grateful if Ofcom could confirm that it will:

- Publish the full mapping methodology undermining the rural postcodes dataset;
- Explain how it has treated borderline or boundary cases;
- Explain how it will enable the dataset to be updated over time and how it will notify providers of such updates; and
- Explain how operators may challenge rurality classifications in the event they disagree.

Vodafone Three has a strong track record of making considerable efforts to reinstate coverage to rural communities

Truly rural areas without any overlapping network coverage represent a tiny fraction of VodafoneThree's customer base. Merely identifying that an outage has affected a "rural" cell site does not necessarily mean that there is any increased risk of consumer harm occurring and does little to alleviate any consumer harm that exists. In this regard, VodafoneThree notes with pride its strong track record of surging resources to rural communities affected by outages. While we appreciate Ofcom's wish to have better oversight over outages affecting rural communities, Ofcom has not demonstrated how it will use any reports generated from the new thresholds in a way which helps the industry work towards reduced customer impact outcomes. This is especially disproportionate in circumstances where VodafoneThree routinely takes these types of incidents seriously and makes considerable efforts to restore coverage timeously, especially where we are aware that an incident is impacting an isolated rural community.

The eight-hour duration threshold is problematic

In addition, Ofcom's proposed eight-hour reporting threshold for incidents affecting a single rural cell site is problematic. Rural sites are inherently more difficult and slower to restore, due to factors including geography, access constraints, weather conditions, engineer availability, road closures and power limitations. As such, a threshold which triggers at eight hours risks capturing routine rural maintenance and restoration events rather than genuinely significant incidents.

Ofcom's proposal risks generating duplicative reports due to the SRN or site-share agreements

VodafoneThree is also concerned that Ofcom's proposed single rural cell-site threshold risks triggering a large number of duplicative, individually low-significance reports, as currently drafted. As Ofcom is aware, VodafoneThree operates a number of partnership agreements for cell sites (in particular, with VMO2 and BT/EE), as well as Shared Rural Network (SRN) sites. These sites share common power and, sometimes, common backhaul. As currently drafted, Ofcom's proposal would mean that a failure at a single shared site would breach the rural single cell-site threshold for every operator using that site, producing multiple separate reports for the same, small incident. While Ofcom has acknowledged that this proposal may result in a level of

duplicative reporting, to meaningfully comment on this proposal we require further clarification from Ofcom as to:

- What Ofcom’s expectations will be in relation to reporting incidents where the SRN or a site-sharing agreement is in place; and
- Whether all parties present at a site will be expected to make the same report, or whether the operators can agree that only one party needs to make a report.

The single rural cell-site threshold is at odds with Ofcom’s Resilience Guidance

While we acknowledge that the activities of customers in rural areas may be affected to a greater extent by an incident impacting the operation of the network or service, we consider Ofcom’s focus on incidents affecting single rural cell-sites to be disproportionate to the risk posed to national resilience and security. We note that in June 2026, Ofcom published its updated Network and Service Resilience Guidance for Communications Providers. In this Guidance, Ofcom explicitly acknowledges that: *“Given the scale and geographical reach of network assets within access networks, it can become costly to create highly resilient access networks. Ofcom is aware that this [Access / Last Mile] domain is likely to have single points of failure, but also understand[s] that the customer concentration should be significantly lower in comparison to the core of networks”* (see section 4.2.1).

Indeed, in providing guidance on specific ways of improving resilience in this domain, Ofcom even acknowledged that *“What is appropriate and proportionate in any given case will depend on the consideration of many factors, such as the number of customers that would be impacted by a given failure, geographical size of the coverage area impacted by a given failure, the service level requirements and criticality of the services being provided, and whether the degree of connectivity resilience is appropriate for the customers being served by that site”* (see section 4.2.1). In our view, the proposed single rural cell-site reporting threshold is at odds with this acknowledgement, for the reasons we have already explained above.

Cell site (urban and semi-urban) thresholds

VodafoneThree notes that, alongside revising the thresholds based on customer numbers, Ofcom proposes to introduce a requirement to report mobile outages affecting a large geographic area. For semi-urban and urban areas, we understand that Ofcom proposes that this would include outages where twenty-five or more cell sites in the same area have failed, and for rural areas, Ofcom is proposing that this would mean outages at one cell site or more. As set out above, we would be grateful for clarification as to whether the twenty-five cell site threshold within Table 2 is intended to be triggered by the failure of twenty-five cell sites across the network, or only within the “same area”. For the purpose of this section, we assume Ofcom intended the latter.

This proposal does not clearly define a “large geographic area” or the “same area” in a way which would enable VodafoneThree or other operators to meaningfully assess their reporting

obligations. While Ofcom has indicated that the threshold for “rural” areas would be one cell site or more (classified as “rural” in accordance with its rural postcodes dataset), Ofcom has not defined the area in which the failure of twenty-five or more cell sites would trigger a reporting obligation. We would welcome clarity from Ofcom as to how it envisages defining these areas, given the impact of a loss of twenty-five cell sites in a square mile would clearly differ from a loss of twenty-five cell sites within a hundred-mile radius of a single point.

Notwithstanding this uncertainty, we consider the failure of twenty-five or more cell sites in the “same area” to be a poor proxy for customer impact. The significance of and impact on service levels of such an outage depends on various factors, such as the population of the relevant area, the total volume of cell sites serving that area, and the extent of overlapping coverage. We note that VodafoneThree frequently observes no impact on its national Key Performance Indicators (KPIs) until an incident leads to the failure of two hundred cell sites, an eight-fold increase on Ofcom’s proposed twenty-five cell site threshold.

VodafoneThree currently reports outages affecting regional areas, such as incidents affecting cell sites across “The Midlands”, “London”, “Wales” or “Scotland”. We require clarification from Ofcom as to how its new proposals differ from this level of existing reporting. Depending on the extent they differ, there would be time and cost consequences associated with amending VodafoneThree’s processes to bring them into compliance.

Finally, we note that Ofcom’s proposed threshold would be triggered by an incident affecting twenty-five cell sites for more than two hours. We consider the temporal aspect to this threshold to be far too low. In VodafoneThree’s experience, common backhaul-ring and transmission failures affecting multiple sites at the same time often take two to four hours to resolve. Accordingly, this threshold may be triggered by routine events which are promptly resolved. In addition to resolving VodafoneThree’s other concerns with the twenty-five cell site (urban and semi-urban) threshold, we also request that Ofcom consider a longer temporal threshold. We consider this necessary if Ofcom wishes to focus on genuinely significant outages which warrant its attention from a resilience perspective, as opposed to common faults which fall well within normal operating parameters.

The critical reporting threshold is inappropriate given the consequences

VodafoneThree notes that Ofcom proposes to reduce the threshold for critical reporting (formerly “Urgent”) from 3 million to 1.5 million user-hours lost. We understand that the principal reason for this proposed change is to better reflect the subscriber bases of Tier 2 MVNOs (whose subscriber bases start at c. 1.5 million subscribers), and to enable Ofcom to gain a more accurate picture of the significant security compromises that communications providers are dealing with, as well as any patterns that might occur, without causing communications providers to incur any “material costs”.

We assume that when Ofcom refers to “user-hours lost”, it is referring to the figure which results from multiplying the number of end customers affected by the duration of the service

loss/disruption (given this calculation is included at paragraph 5.28 of the draft revised Statement of Policy), though we would be grateful if Ofcom could confirm. As Ofcom is aware from prior engagement, there is an industry-wide challenge with calculating user-hours lost and providers often provide “estimates” of user-hours lost. We would therefore be grateful if Ofcom could consider whether there is a methodology to calculate user-hours lost which it would prefer that operators use, in the absence of existing native solutions. If Ofcom proceeds with reducing the “critical” incident threshold by *half*, we are concerned that this could lead to a disproportionate increase in critical incident reports. These incidents require a three-hour notification, which is a significant burden on VodafoneThree’s operational teams, while they are busy managing high pressure situations and working hard to restore service to our customers. This change should not be introduced lightly, and we would be grateful if Ofcom could model the expected change in the volume of critical incident notifications which would occur should this proposal be implemented.

We also request that Ofcom confirm that the three-hour notification requirement may be discharged by way of a short email or call from the provider to Ofcom. This is because incidents frequently occur out-of-hours and the types of incident which meet the critical threshold require close attention from our teams who should, in our view, prioritise service restoration and customer management at the peak of an incident, rather than reporting obligations.

Finally, we are concerned to note that Ofcom has proposed changes to the media coverage upgrading factor such that providers must notify a security compromise as “critical” if it attracts not only national mainstream media coverage, but also local or trade media coverage. The mere fact that a security compromise attracts local or trade media coverage is not, in our view, sufficient to merit notification as a “critical” incident. Local or trade media coverage is not defined within the consultation, and it is unclear what level of coverage will be sufficient to upgrade a security compromise to “critical”. Even if the threshold were better defined, media coverage is a poor proxy for customer impact and severity, as it lacks objectivity and grounding in measurable customer impact. Trade media coverage, for example, is often driven by minor outages generated on the website “Down Detector”, despite these incidents not representing “critical” incidents according to any objective industry-wide thresholds. We therefore consider it inappropriate for a statutory reporting consequence to attach to this factor. While “national” media coverage is more likely to be attracted by genuinely significant incidents, we request that Ofcom remove the local and trade media coverage triggers from paragraph 5.28.

The catch-all significant incident requirement is too vague

VodafoneThree notes that at paragraph 3.41 of the Consultation, Ofcom has proposed to add that incidents that have a “significant effect” on the operation of the network or service remain reportable, even if they do not meet Ofcom’s criteria or thresholds, to make clear that providers must always make reports if they assess that the security compromise is significant. We are concerned that the introduction of this language will result in defensive, over-reporting to avoid compliance consequences.

Statutory reporting obligations should be clearly defined and proportionate, as serious financial and reputational consequences follow from non-compliance. In circumstances where Ofcom has not provided any further clarification on what would constitute a “significant effect” beyond the factors it has already listed in its draft revised Statement of Policy, this requirement creates uncertainty for VodafoneThree when attempting to apply Ofcom’s guidance, and could reasonably be expected to encourage defensive over-reporting, with associated time and cost implications for the business.

The proposed combined severe weather classification is too vague

At paragraph 3.46 of the Consultation, Ofcom has proposed further guidance on linking incidents relating to storms or other types of severe weather, stating that communications providers should report combined service interruptions that reach the reporting thresholds, including in cases that are not localised. As currently set out in the draft revised Statement of Policy, this guidance states that: *“Providers should report if any combined interruptions in their service reach the thresholds. This could be in instances of severe weather (for example, storms, heatwaves, space weather) and does not need to be localised”*. We assume that Ofcom does not intend that simultaneous interruptions occurring throughout the entire network should become reportable where there is no common cause (e.g., storms or other types of severe weather). Otherwise, this proposal has the potential to greatly increase the volume of reporting, with little benefit to Ofcom. However, if this proposal is genuinely designed to capture dispersed incidents that are “linked” to a particular cause, such as severe weather, then VodafoneThree requires further clarification of how providers should attempt to aggregate dispersed incidents and whether there is a temporal duration element to the threshold, before it can provide any informed commentary.

Ofcom’s changes lead to a cumulative increase in the volume and burden of monthly bulk reporting

Taken in the round, VodafoneThree is concerned that Ofcom’s proposed changes to incident reporting thresholds will lead to a disproportionate and burdensome increase in the volume and burden of the monthly bulk reporting process, due to the proposed cell-site and rural thresholds. We therefore request that, to the extent any of these new thresholds or criteria are implemented, Ofcom commits to monitoring the volume of bulk reports which are made and remains open to further submissions from providers about the impact of these arrangements on their business, in case further severity metrics need to be overlaid to better target genuinely significant incidents.

The proposed increased reporting of pre-positioning security compromises introduces uncertainty

At paragraph 3.43 of the Consultation, Ofcom has indicated concern that it has not received the volume of pre-positioning-type security compromise reports that it believes would realistically correlate with the number of incident reports it receives. To address this, we understand that Ofcom intends to add the specific term “pre-positioning” to its description of this kind of attack and give a notable recent example.

It is unclear to VodafoneThree why Ofcom considers this change to be necessary, or what types of incidents Ofcom believes are occurring without security compromise reports being generated. We strongly believe that before any changes to Ofcom's guidance are implemented, Ofcom should engage with industry stakeholders in a multi-lateral meetings to discuss Ofcom's concerns.

VodafoneThree complies with its existing reporting obligations in relation to pre-positioning-type security compromise reports and does not consider that the proposed introduction of a new definition for pre-positioning security compromise assists matters. As currently drafted, this change would result in incidents becoming reportable where an attacker gains access to *any* system that could *theoretically* be used to support a future attack, even where: (i) no customer impact has occurred; (ii) no critical assets have been accessed; and (iii) multiple security controls remain between the attacker and any *high-value* target, and the compromise has been *rapidly contained*. In VodafoneThree's experience, this would result in a significant increase in the volume of low-significance reports. We therefore require further clarification as to what Ofcom's concern is to avoid the risk of significant over-reporting of early-stage intrusion activities, such as endpoint compromises or contained phishing activities, and we consider the appropriate forum for this clarification would be an Ofcom-industry meeting. Ofcom should supplement the revised reporting guidance with a practical decision framework, worked examples and telecom-specific case studies. This would improve consistency of reporting across operators, reduce unnecessary notifications, and provide greater certainty regarding emerging areas such as threat actor pre-positioning, attempted compromise activity, and management plane intrusions.

Question 4: Do you have any comments about the proposed changes to our reporting templates?

Vodafone Three notes that Ofcom is proposing changes to its incident reporting template to reflect the changes introduced by this consultation. Overall, VodafoneThree supports Ofcom's objective of improving its understanding of an incident's true impact and is not unduly concerned by Ofcom's changes to the reporting template. However, as explained above, [CONFIDENTIAL REDACT] and our preference would be that Ofcom aligns the reporting form with the metrics which are monitored for reporting purposes (such as failed call attempts or data subscribers). We are further concerned that the introduction of location information is unduly granular (for example, requiring providers to indicate specific global cell IDs and outward postcodes of relatively small urban areas, e.g., Leeds city centre) and does not align with location data available to providers such as VodafoneThree.

We maintain that incidents affecting a single rural cell-site or twenty-five cell sites should not be reportable by virtue of individual incident notification forms, but should be reported by way of the monthly bulk reporting forms, for the reasons set out above.

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?

VodafoneThree supports Ofcom's stated objective of using global cell IDs to improve incident mapping. However, we are concerned that Ofcom's proposal - that providers submit a monthly list of their RAN cells (together with the detailed information set out in Ofcom's proposed cell data reporting standard) - could present a security risk unless managed carefully and otherwise places a disproportionate burden on providers' teams.

Before embarking on this exercise, we respectfully request that Ofcom revisits the values it has requested, minimises its request to only the data required to map global cell IDs to physical locations and explains why it requires each value to be provided. Any values which are unnecessary to achieve Ofcom's stated objective of using global cell IDs to improve incident mapping and understand how security compromises are affecting communities across different geographic locations in the UK should be removed from the proposed cell data reporting standard. Similarly, if Ofcom remains minded to request such sensitive information, it should clearly set out how it intends to implement secure transmission, storage, retention, access and onward-sharing arrangements to minimise the risk of these datasets being compromised.

While Ofcom suggests that operators already provide this information on a monthly basis and could comply with this proposal by simply adding Ofcom to existing distribution lists to which this information is already sent, this is incorrect. VodafoneThree does not currently provide cell-level reports at the granularity proposed elsewhere. Accordingly, to develop a regular, monthly reporting pipeline to enable VodafoneThree to comply with Ofcom's proposal would require VodafoneThree to incur significant, time, effort and costs. VodafoneThree is unable to comment on the feasibility or scale of this exercise in an informed manner in circumstances where the acronyms listed in Ofcom's Annex 11 are not defined within the consultation materials. We therefore request that Ofcom share the definitions of each of the values listed within the Cell data reporting standard at Annex 11 to Ofcom's consultation.

More broadly, if VodafoneThree's concerns (set out above) are resolved, we would nonetheless require a reasonable implementation period to deliver and test this new reporting process.

Comment on implementation and timeframe

We note that, following this consultation period, Ofcom plans to publish a statement in Autumn 2026.

Our preliminary impact assessment confirms that VodafoneThree does not currently have the capability to support some of the proposals set out in this consultation and we are concerned that Ofcom's own impact assessment does not accurately reflect the significant time, cost and resourcing impact of implementing Ofcom's proposed changes.

Whilst Ofcom's impact assessment concludes that the proposed changes will not be unduly difficult or costly to implement, we note that there are a variety of processes which would need to take place for VodafoneThree to comply with the proposed changes. For example:

- Implementing the proposed reporting thresholds will require integrating several currently disparate datasets, none of which are designed to interoperate or support automated correlation. Building a reliable end-to-end reporting pipeline will require new data architecture, data translation processes and validation tooling.
- Similarly, based on our current support model, to implement cell-level reporting in areas covered under mast sharing agreements, VodafoneThree will need to work with several partners to ensure the availability and provision of the necessary data to support this approach, potentially with time and cost implications associated with negotiating amendments to our Beacon (VMO2) and MBNL (EE) shared services contracts.

Furthermore, as noted throughout our response, there is significant ambiguity surrounding the intent and scope of Ofcom's proposed changes. This means it is difficult for us to undertake a detailed impact assessment of the implementation cost and timelines associated with the changes required to VodafoneThree's systems and processes. For example, it has not been possible to assess the feasibility of implementing Ofcom's monthly RAN cell-level data reporting proposal, as the specific attributes Ofcom has indicated should be reported are not adequately defined. There are numerous ambiguities within the consultation which act as barriers to our current ability to assess the timescales and costs of implementation, such as (i) the scope of the 'geographic' threshold test (definition of 'same area'); (ii) scope of the severe weather aggregation test (how Ofcom intends that dispersed incidents caused by severe weather should be aggregated for reporting purposes); and (iii) the scope and definition of a "pre-positioning security compromise".

We also note that Ofcom does not appear to have provided for an implementation period from the publication of its Autumn statement. We strongly urge Ofcom to engage with industry to resolve the points of uncertainty in its consultation before moving towards any implementation, and to afford providers a reasonable implementation period. Having reviewed Ofcom's proposed changes (to the extent possible with the information available), our preliminary assessment indicates that this work would require **[CONFIDENTIAL REDACT] months** to design, test and operationalise. This estimate may need to be revised pending further clarity from Ofcom on the scope of its proposed changes.