

Dear [Sirs](#),

Digital economy Act: Ofcom consultation

In response to your consultation I write to share a widely held concern that universities might be classified as 'subscribers' under the Act and consequently at risk of suspension or severe restriction of internet service. Whilst King's College London, like many others, subscribes to the JANET Acceptable Use Policy, backed up by our own Acceptable Use and Information Security Policies (in turn enforced through our Information Services and Systems Regulations for both staff and students), the scale of monitoring required in a complex information landscape should not be underestimated. In our case this runs the gamut from open wi fi enabled environments to highly secure research facilities for medical and other sensitive research. However much we may wish to be compliant the speed of development in mobile technologies will inevitably constitute a significant challenge.

In the highly competitive international market in which we operate there also has to be serious concern about the potential cost of appeals and impact of service suspension.

The definition of universities as 'Qualifying ISPs', assuming a reduction in the 400,000 threshold numbers for subscribers, would seem a good deal more appropriate in terms of our service role and method of operation. It would allow us to build on existing methodologies for protection via JANET and locally, while ensuring a secure and sustainable service for the many thousands of our staff, students, research partners and visitors who use the internet responsibly on a daily basis and themselves routinely create copyright material.

Yours faithfully,