

Your response

Questions concerning Ofcom's draft general statement of policy under section 105Y of the Communications Act 2003 (see Annex A5).

Question	Your response
Consultation question 1: Do you have any comments on our proposed approach to compliance monitoring?	<i>NO</i>
Consultation question 2: Do you have any comments on our proposed approach to testing?	<i>NO</i>
Consultation question 3: Do you have any comments on our proposed approach to enforcement?	<i>NO</i>
Consultation question 4: Do you have any comments on our proposed approach to reporting security compromises?	<i>NO</i>
Consultation question 5: Do you have any comments on our proposed approach to information sharing?	<i>NO</i>
Consultation question 6: Do you have any other comments on our draft statement of general policy set out at Annex A5 to this consultation?	<i>NO</i>

Questions concerning Ofcom’s draft guidance on resilience requirements in sections 105A to D of the Communications Act 2003 (see Annex A6).

Question	Your response
<p>Consultation question 7: Do you have any comments on our proposed approach to resilience set out in section 4 of the draft guidance at Annex A6 to this consultation?</p>	<p><i>The proposed approach is not detailed enough and relies on the provider to identify and mitigate the risks, this should be done in consultation with local groups, such as MDCC who understand the risks, through past experience.</i></p>
<p>Consultation question 8: Do you have any comments on our proposed resilience guidance set out in section 5 of the draft guidance at Annex A6 to this consultation?</p>	<p><i>The proposed guidance leans heavily toward a security incident.</i></p> <p><i>The loss of connectivity through flooding and power failure is referenced in section 5, however there needs to be more emphasis on loss of connectivity due to the result of weather events.</i></p> <p><i>Within Mid Deeside the residents (numbering approximately 4500) have experienced several severe weather events in the past 12 months that caused power outages, resulting in the loss of connectivity to mobile networks and land lines that had been upgraded to digital lines.</i></p> <p><i>The rollout of digital lines has been paused, however parts of the community have already had the upgrade. This resulted in no ability to make any calls, including emergency calls, or the ability to connect to the internet, leaving vulnerable people completely isolated from the outside world and emergency services.</i></p> <p><i>Consideration needs to be given to how residents can access telecoms services in the event of a prolonged power outage, in the past year some residents were without power for up to 8 days.</i></p>
<p>Consultation question 9: Do you have any other comments on our draft guidance set out at Annex A6 to this consultation?</p>	<p><i>Consideration should be given specifically to mobile/wireless telecoms providers to demonstrate robust resilience plans to ensure power can be delivered to the network masks thus ensuring that mobile networks are available, providing the ability to make emergency calls and access the Internet.</i></p>