

Telecommunications (Security) Act: business impact survey - March 2022

Start of Block: Introduction

Introduction.

The Telecommunications (Security) Act was passed on 17th November 2021. The Act contains new duties on providers of public electronic communications networks and services to identify and reduce the risk of security compromises, and prepare for the possibility of their occurrence. The Act also places duties on providers to prevent, remedy or mitigate any adverse effects of security compromises. These overarching security duties are intended to provide an effective and enduring basis for protecting networks and services.

The Act also provides the government with new powers to make regulations and issue codes of practice. New regulations will set out specific security measures in secondary legislation, providing legal clarity on where providers must focus their efforts to secure their public networks and services. An accompanying code of practice will provide detailed technical guidance measures to demonstrate how providers can meet their legal obligations.

The intention of this survey is to gather information on the impact of the draft regulations and draft code of practice on affected businesses. The deadline to submit this survey is **12th April 2022**.

End of Block: Introduction

Start of Block: Survey Instructions

Instructions

The survey is split into sections. Sections 1, 2 and 12 provide information about your company and the overarching impact of the draft regulations and draft code of practice and must be completed by all respondents.

Sections 3 - 11 relate to the draft security requirements to be contained in the draft Electronic Communications (Security Measures) Regulations 2022 and the corresponding sections are set out below. These sections are not required to complete the survey but should be completed

where possible as they will provide DCMS with important information on the impact of individual draft regulations.

- 3 - Questions on draft regulation 3 on 'Network architecture'
- 4 - Questions on draft regulations: 4 on 'Protection of data and network functions'; 5 on 'Protection of certain tools enabling monitoring or analysis'; and 6 on 'Monitoring and analysis'.
- 5 - Questions on draft regulation 7 on 'Supply chain': impact on your company
- 6 - Questions on draft regulation 7 on 'Supply chain': impact on your suppliers
- 7 - Questions on draft regulations: 8 on 'Prevention of unauthorised access or interference'; 10 on 'Governance'; 11 on 'Reviews'; and 12 on 'Patches and updates'.
- 8 - Questions on draft regulation 9 on Preparing for remediation and recovery
- 9 - Questions on draft regulation 13 on Competency
- 10 - Questions on draft regulation 14 on Testing
- 11 - Questions on draft regulation 15 on Assistance

Please note, if you received an individual link to complete this survey your responses will save automatically so you can exit the survey and continue another day as long as you use the same link. This also means that multiple colleagues can input using the same link. If you are responding using the the link provided on gov.uk you may leave and return to the survey but only on the same internet browser on the same computer.

What you will need for completion of this survey:

You will need to have read and understood the: draft Electronic Communications (Security Measures) Regulations 2022 and draft Telecommunications Security Code of Practice which are published alongside this survey. You will need to know the changes you would make to your business as a result of the regulations and code of practice. This may include changes to IT systems, network equipment and general processes and policies such as IT processes and security policies. You will need estimates of up-front and ongoing annual costs to implement these changes. Where you do not know the specific changes you will need to estimate the costs of meeting the measures in the draft regulations and guidance in the draft code of practice.

How to answer:

Unless specified otherwise please include ongoing costs as an annual figure in GBP and consider this over a 10 year period. Where you expect costs to vary significantly over that period please specify. When estimating costs please include internal and external costs e.g. the number of hours of legal advice can include those accounted for by staff and/or external

lawyers. Please refer to the implementation timeframes set out in the draft code of practice.

Please note:

We ask for the overarching costs of implementing the draft regulations. We then go on to ask you about the costs of implementing each individual draft regulation. Please complete all sections to the extent that you are able. We appreciate these costs will only be estimates of the costs you expect to incur based on the information that is available to you now. These costs estimates may differ from previous estimates submitted and the actual costs you will incur. This survey is not intending to assess the impact of assurance and regulatory reporting costs. These are matters for Ofcom, which will be conducting separate engagement and consultation on their approach to compliance.

Queries:

If you have any queries regarding how to complete the survey please contact security.framework.consultation@dcms.gov.uk.

Submitted responses

All responses will be strictly confidential and used by DCMS and its technical advisors, including NCSC, to assist with policy development. Any information published in a final impact assessment will be aggregated and anonymised. Information submitted will not be used for any compliance or regulatory purposes.

The respondent acknowledges that DCMS is subject to the Freedom of Information Act (FOIA) and may, acting in accordance with the Cabinet Office Code of Practice on the discharge of public authorities' functions under Part I of FOIA, be obliged to disclose Confidential Information. DCMS shall take reasonable steps, where appropriate, to give the respondent advanced notice, or failing that, to draw the disclosure of any Confidential Information to the respondent's attention promptly after any such disclosure. The respondent further acknowledges that any markings of confidentiality are of indicative value only and that DCMS may be obliged to disclose it in accordance with the Cabinet Office Code of Practice, and agrees that such disclosure shall not constitute a breach of confidence under this Agreement. Notwithstanding the foregoing, at all times DCMS shall be mindful of the respondent's commercial interests before disclosing any Confidential Information, as well as applicable competition laws. The respondent shall provide to DCMS such information and assistance as is reasonably required to support DCMS in responding to a request for information received under FOIA.

End of Block: Survey Instructions

Start of Block: Data Protection

Data protection Disclosure of responses

1. Data Controller:

The Department for Digital, Culture, Media & Sport (DCMS) is the “data controller”. This means that we are responsible for any of your personal data that we collect or use. We will ensure that we will treat all personal information in accordance with data protection legislation, including the General Data Protection Regulation and Data Protection Act 2018.

When DCMS or its agencies collects, holds, uses or processes in any way your personal data, you are entitled to be told:

- the purpose for which the data is being used, and our lawful basis for processing it
- how long we will keep your data, who we will share it with
- whether it will be transferred or accessed outside the UK or EU, and what legal safeguards are in place to protect it
- about any rights you may have, including the right to access your information, or to object to its being used
- about your right to complain to the Information Commissioner if you feel that your personal information has been mishandled
- about the identity of our Data Protection Officer (an independent advisor on data protection matters)

2. Why we are collecting your personal data:

When we ask for your personal data, we promise only to ask for what we need, and to make sure you know why we need it.

Personal information such as contact details (email address and company name) will be captured in the survey. This will allow DCMS to verify the identity of respondents and allow for DCMS to recontact if queries arise from the survey. If you do say yes to us contacting you, you can withdraw your consent at any time.

The IP address associated with your location will automatically be captured by the survey platform. Although the questions don't specifically ask for any personal information, it is possible that your responses to questions may include information through which you could be identified. All data collected is being collected and processed by DCMS to inform its work on the Government's new Electronic Communications (Security Measures) Regulations and Telecommunications Security Code of Practice.

DCMS will publish an impact assessment which will draw on responses received. The impact assessment will not identify individuals or organisations who have responded to the consultation. However, the impact assessment may refer to the sector the response relates to.

DCMS will be collecting partial responses to the survey. If, during completion of the survey you decide to withdraw your response, you will need to return to this Disclosure of Responses page by using the 'Back' button, and select 'No' from the drop down menu below.

3. Our legal basis for processing your personal data:

The Data Protection Legislation states that, as a government department, the department may process personal data as necessary for the effective performance of a task carried out in the public interest i.e. a consultation.

4. With whom we will be sharing your personal data:

Qualtrics is the online survey platform used to conduct this survey:
<https://www.qualtrics.com/privacy-statement/>

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

5. For how long we will keep your personal data, or criteria used to determine the retention period:

Your personal data will be held for 2 years after the survey is closed. This is so that the department is able to analyse the responses to fully inform the Department's work on this impact assessment and any further work following on from this consultation.

6. Your rights, e.g. access, rectification, erasure:

The data we are collecting is your personal data, and you have rights that affect what happens to it. You have the right to:

- (a) know that we are using your personal data
- (b) see what data we have about you
- (c) ask to have your data corrected, and to ask how we check the information we hold is accurate
- (d) ask to have your data deleted
- (e) complain to the Information Commissioner's Office (see below)

In some circumstances you may also have the right to withdraw your consent to us having or using your data, to have all data about you deleted, or to object to particular types of use of your

data. We will tell you when these rights apply.

You can also make a complaint to the Information Commissioner, who is an independent regulator:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org.uk
Telephone: 0303 123 1113
Textphone: 01625 545860
Monday to Friday, 9am to 4:30pm

7. Sending data overseas:

Your personal data will not be sent overseas.

8. Automated decision making:

Your personal data will not be used for any automated decision making.

9. Storage, security and data management:

Your personal data will be stored securely and will be protected to make sure nobody has access to it who shouldn't.

You can ask us for details of our instructions to staff on how to collect, use and delete your personal data.

10. How to access your personal information:

If you would like a copy of any personal information that we hold about you, please contact the relevant team or agency in the DCMS. We will require proof of ID.

If you do not know who holds your information, or you do not know who to ask, please contact the general contact address and provide as much information as possible about what information you think we hold.

Department for Digital, Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ

Email enquiries@dcms.gov.uk
Telephone enquiries 020 7211 6000

11. Data Protection Officer:

If you have any concerns about how the department is handling your personal data, you may contact the department's Data Protection Officer (DPO).

The DPO provides independent advice and monitoring of DCMS's use of personal information. They can be contacted at the following postal and email addresses:

DPO
Department for Digital, Culture, Media & Sport
100 Parliament Street
London
SW1A 2BQ

Email: dpo@dcms.gov.uk

Please confirm below that you have read and understood this statement and agree with its terms.

I have read and understood this statement and agree with its terms (4)

End of Block: Data Protection

Start of Block: Section 1 - Company information

Q1.1a Company information

Which company are you responding to this survey on behalf of?

Q1.1b Please provide a contact email address for the company on whose behalf you have responded.

This will allow DCMS to verify the identity of respondents and allow for DCMS to recontact if queries arise. In some cases DCMS may contact you following submission of the survey to arrange a clarification interview. The intention of this interview will be to ask follow up questions to clarify any responses that we are unclear on or want to explore further. These interviews will be optional. Please provide a contact email address only.

Q1.2 Please state your total revenue in GBP from UK operations in the last financial year.

Q1.3 Are you a provider of a public electronic communication network provider or public electronic communication service? As defined in the Communications Act (2003), “public electronic communications network” means an electronic communications network provided wholly or mainly for the purpose of making electronic communications services available to members of the public; and “public electronic communications service” means any electronic communications service that is provided so as to be available for use by members of the public.

- Provider of public electronic communication network (1)
- Provider of public electronic communication service (2)
- Both (3)
- Neither (please explain) (4)

Q1.4 Please state your company activities in respect to the provision of public communication services or networks.

A vertically integrated network operator (You operate and own a public electronic communications network based on which you sell services to consumers) (4)

A wholesale Network operator (You operate and own a public electronic communications network based on which you sell services to companies providing retail services) (5)

A Reseller with network infrastructure (You sell services to consumers which you purchase from a wholesale network operator, but you also own some network infrastructure) (6)

A Reseller without network infrastructure (You only sell services to consumers which you purchase from a wholesale network operator, you don't own any network infrastructure) (7)

Other, please specify (8)

Q1.5 Please state your revenue arising from the activities listed in question 1.4 in GBP from UK operations in the last financial year.

Q1.6 The government proposes to allocate telecommunications providers to different tiers based on relevant turnover. These proposals are set out in the accompanying consultation

document. Based on these proposals which Tier do you expect the company you are responding on behalf of to be in?

- Tier 1 (1)
- Tier 2 (2)
- Tier 3 (3)
- Not sure (4)

End of Block: Section 1 - Company information

Start of Block: Section 2 - Questions of overarching impact of the draft security requirements

Q2.1

Which of the measures detailed in the draft Electronic Communications (Security Measures) Regulations 2022 do you already comply with? Please note, these responses will be used to assess the extent of the changes that affected providers will need to make, so please provide as accurate an answer as possible.

- All measures (1)
- Around three-quarters of measures (2)
- Around half of measures (3)
- Around a quarter of the measures (4)
- None of the measures (5)

Q2.2 Based on the draft regulations and draft code of practice published alongside this consultation. What costs do you expect to incur as a result of familiarisation (defined as the costs of reading and understanding new/amended regulatory requirements and guidance) with: a) the Electronic Communications (Security Measures) Regulations 2022; and b) the

Telecommunications Security Code of Practice? Please give your answer inputting the number of person hours required by job function.

	0 - 50 hours (1)	50 - 100 hours (2)	100 - 200 hours (3)	200 - 400 hours (4)	400 hours and above (5)
Legal (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Operational (e.g. IT or network functions) (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other job function, please specify (7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q2.3 How do you plan to comply with the draft regulations?

If you have not yet made this decision, please select your best estimate of the approach you will take.

Note on the role and status of the code of practice: The draft code of practice provides guidance measures on how providers could meet their overarching security duties in the Act and the specific security measures in the draft regulations. If a provider decides to depart from the Code where it applies to them, this would not necessarily put them in breach of their duties (as per the new section 105H of the 2003 Act). However, under section 105I of the 2003 Act, where Ofcom has reasonable grounds for believing that a provider is failing, or has failed, to act in accordance with this guidance where it applies to them, Ofcom may direct them to explain the reasons for the failure. Providers should seek their own independent advice.

- By implementing the requirements set out in the draft code of practice (1)
- By implementing the requirements set out in the draft code of practice where possible but for some areas we will set out our own approach (2)
- By implementing the requirements set out in the draft code of practice in some cases but for the majority of areas we will set out our own approach (3)

Display This Question:

*If How do you plan to comply with the draft regulations? If you have not yet made this decision, please specify your approach
= By implementing the requirements set out in the draft code of practice*

Q2.3a Thinking about your response to question 2.3 on how you plan to comply with the draft regulations. Please select the reason(s) for this approach.

- To maximise chances of full compliance (1)
 - To ensure a standardised approach with other operators (2)
 - To maximise network security (3)
 - Other, please specify (4)
-

Display This Question:

*If How do you plan to comply with the draft regulations? If you have not yet made this decision, please specify your approach
= By implementing the requirements set out in the draft code of practice where possible but for some areas we will set out our own approach*

*Or How do you plan to comply with the draft regulations? If you have not yet made this decision, please specify your approach
= By implementing the requirements set out in the draft code of practice in some cases but for the majority of areas we will set out our own approach*

Q2.3b Thinking about your response to question 2.3 on how you plan to comply with the draft regulations. Please select the reason(s) for this approach.

- Difficult to implement requirements set out in the Code of Practice due to legacy systems (1)
 - To be more cost-effective (2)
 - To maximise network security (3)
 - To align with our company's global approach (4)
 - We prefer another approach, please explain (5)
-

Q2.4 What benefits do you expect will accrue to your business from implementation of the draft Electronic Communications (Security Measures) Regulations 2022? Please tick all that apply.

- Reduce number of security compromises (1)
 - Reduce severity of security compromises (2)
 - Detect security compromises earlier (3)
 - Improve ability to rectify security compromises (4)
 - Reduce number of network outages (5)
 - Reduce severity of network outages (6)
 - Improve ability to rectify network outages (7)
 - Improve offering to customers (8)
 - No real benefit (10)
 - Other, please specify (9)
-

Q2.5 What are your current estimates of the one-off or implementation costs caused by the draft regulations? Please provide an answer thinking about the regulations in total. We will ask for the costs of each regulation individually later in the survey, if you are able to provide this.

- None (1)
 - up to £1m (3)
 - £1m - £5m (4)
 - £5m - £25m (5)
 - £25 - £50m (6)
 - £50 - £100m (7)
 - £100m and above, please specify (8)
-

Q2.6 What are your current estimates of the ongoing annual costs caused by the draft Regulations? Please provide an answer thinking about the regulations in total. We will ask for the costs of each regulation individually later in the survey, if you are able to provide this.

- None (1)
 - up to £500,000 (2)
 - £500,000 - £1m (3)
 - £1m - £2m (4)
 - £2m - £5m (9)
 - £5m - £10m (10)
 - £10m and above, please specify (11)
-

Q2.7 Please describe which measures cause the majority of the costs included in the estimates you have provided in questions 2.5 and 2.6.

Q2.8 If the Electronic Communications (security measures) Regulations were not in place, how would you implement the measures in the draft code of practice?

Note on the role and status of the Code of Practice: The Code will provide guidance on those security measures that are appropriate and proportionate for certain providers to take to comply with their statutory duties. If a provider decides to depart from the Code where it applies to them, this would not necessarily put them in breach of their duties (as per the new section 105H of the 2003 Act). However, under section 105I of the 2003 Act, where Ofcom has reasonable grounds for believing that a provider is failing, or has failed, to act in accordance with this guidance where it applies to them, Ofcom may direct them to explain the reasons for the failure. Providers should seek their own independent advice.

- By implementing the requirements set out in the draft code of practice (1)
- By implementing the requirements set out in the draft code of practice where possible but for some areas we will set out our own approach (2)
- By implementing the requirements set out in the draft code of practice in some cases but for the majority of areas we will set out our own approach (3)

Q2.9 Thinking about your answer to question 2.8, would your implementation or ongoing costs change if you implemented the code of practice in this way and the Electronic Communications (security measures) Regulations were not in place.

Display This Question:

If The government proposes to allocate telecommunications providers to different tiers based on rele... = Tier 2

Q2.10 The government has proposed that to account for the need to to reflect differences in the relative size of public telecoms providers, the draft code of practice proposes that Tier 2 providers should be given an extra two years to implement the guidance measures in the draft code of practice beyond each of the timeframes set out.

How will the extra two years to implement the measures affect your costs estimate?

- No, our estimates will not be affected (7)
- One off costs will stay the same (1)
- One off costs will decrease, please explain why: (3)

- Ongoing costs will stay the same (4)
- Ongoing costs will decrease, please explain why: (5)

Display This Question:

If The government proposes to allocate telecommunications providers to different tiers based on rele... = Tier 3

Q2.11 The government has proposed that to account for the need to to reflect differences in the relative size of public telecoms providers, the draft code of practice proposes that Tier 2 providers should be given an extra two years to implement the guidance measures in the draft code of practice beyond each of the timeframes set out.

Will the extra two years for Tier 2 providers to implement the measures affect your approach to implementation and therefore the costs of implementing the regulations?

- No, our estimates will not be affected (7)
- One off costs will stay the same (1)
- One off costs will decrease, please explain why: (3)
-
- Ongoing costs will stay the same (4)
- Ongoing costs will decrease, please explain why: (5)
-

Q2.12 Did you previously submit a response to our Telecoms Security Requirements: business impact survey published in January 2021?

- Yes (1)
- No (2)
- Not sure (3)

End of Block: Section 2 - Questions of overarching impact of the draft security requirements

Start of Block: Section 3 - Questions on Regulation 3: Network Architecture

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q3.1a Have your estimates for the impact of draft regulation 3 on Network Architecture changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 4) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft regulation 3 on Network Architecture changed since su... = Yes

Q3.1b What are the key changes since your previous response?

Q3.2 What are your current estimates of the one-off or implementation costs caused by draft regulation 3 on Network Architecture?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £25m (4)
 - £25m - £75m (5)
 - £75m and above, please specify (6)
-

Q3.3 What are your current estimates of the ongoing annual costs caused by draft regulation 3 on Network Architecture?

- None (1)
 - Under £250,000 (8)
 - £250,000 to £1m (2)
 - £1m - £2m (3)
 - £2m - £5m (4)
 - £5m and above, please specify (5)
-

Q3.4 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 3.

End of Block: Section 3 - Questions on Regulation 3: Network Architecture

Start of Block: Section 4 - Questions on Regulations 4-6

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q4.1a

This section contains questions on draft regulations: 4 on 'Protection of data and network functions'; 5 on 'Protection of certain tools enabling monitoring or analysis'; and 6 on 'Monitoring and analysis'.

In the 2022 version of the draft Regulations, regulation 5 (Protection of certain tools enabling monitoring or analysis) has been added. It contains the provisions in previous draft regulations 4 (on Protection of data and network functions) and 5 (on Monitoring and Audit) that relate to access from outside the UK.

Thinking about draft regulations 4, 5 and 6 in aggregate. Have your estimates for the impact of these regulations changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 5) (2)
- Not sure (3)

Display This Question:

If This section contains questions on draft regulations: 4 on 'Protection of data and network functi... = Yes

Q4.1b What are the key changes since your previous response?

Q4.2 What are your current estimates of the one-off or implementation costs caused by draft regulation 4 on Protection of data and network functions?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £25m (4)
- £25m - £75m (5)
- £75m and above, please specify (6)

Q4.3 What are your current estimates of the ongoing annual costs caused by this draft regulation 4 on Protection of data and network functions?

- None (1)
- Less than £250,000 (2)
- £250,000 to £1m (6)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above (please specify) (5)

Q4.4 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 4.

Q4.5 What are your current estimates of the one-off or implementation costs caused by draft regulation 5 on Protection of certain tools enabling monitoring or analysis?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £25m (4)
- £25m - £75m (5)
- £75m and above, please specify (6)

Q4.6 What are your current estimates of the ongoing annual costs caused by draft regulation 5 on Protection of of certain tools enabling monitoring or analysis?

- None (1)
- Less than £250,000 (2)
- £250,000 to £1m (6)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above (please specify) (5)

Q4.7 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 5.

Q4.8 What are your current estimates of the one-off or implementation costs caused by draft regulation 6 on Monitoring and analysis?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £25m (4)
- £25m - £75m (5)
- £75m and above, please specify (6)

Q4.9 What are your current estimates of the ongoing annual costs caused by draft regulation 6 on Monitoring and Analysis?

- None (1)
- Less than £250,000 (2)
- £250,000 to £1m (6)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above (please specify) (5)

Q4.10 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 6.

End of Block: Section 4 - Questions on Regulations 4-6

Start of Block: Section 5 - Questions on Regulation 7: Supply Chain; impact on your company

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q5.1a Have your estimates for the impact of draft regulation 7 on Supply Chain on your company changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 6) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft regulation 7 on Supply Chain on your company changed... = Yes

Q5.1b What are the key changes since your previous response?

Q5.2 What are the one-off or implementation costs caused by draft regulation 7 on Supply Chain on your company ?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £25m (4)
- £25m - £75m (5)
- £75m and above, please specify (6)

Q5.3 What are the ongoing annual costs caused by draft regulation 7 on Supply Chain on your company ?

- None (1)
- Less than £250,000 (6)
- £250,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q5.4 Please describe which measures cause the majority of the costs included in the estimates you have provided.

End of Block: Section 5 - Questions on Regulation 7: Supply Chain; impact on your company

Start of Block: Section 6 - Questions on Regulation 7: Supply Chain; impact on your suppliers

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q6.1a Have your estimates for the impact of this draft regulation 7 on Supply Chain on your suppliers changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 7) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of this draft regulation 7 on Supply Chain on your suppliers c... = Yes

Q6.1b What are the key changes since your previous response?

Q6.2 How many of your suppliers do you expect to be affected by the Electronic Communications (Security Measures) Regulations 2022? Where possible, please provide a number of affected suppliers in the text box.

	All (1)	Some (2)	None (3)
Network equipment vendor (4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Third party administrator (5)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6.3 What costs do you expect a typical network equipment vendor will incur as a result of the Electronic Communications (Security Measures) Regulations 2022, considering their contracts with you?

	None (1)	Less than £1m (2)	£1m - £2m (3)	£2m - £5m (4)	£5m-£10m (5)	Above £10m (6)
One off costs (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ongoing annual costs (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6.4 Please describe the impacts that you expect will cause the majority of costs for network equipment vendors.

Q6.5 What costs do you expect a typical third party administrator will incur as a result of the Electronic Communications (Security Measures) Regulations 2020, considering their contracts with you?

	None (1)	Less than £1m (2)	£1m - £2m (3)	£2m - £5m (4)	£5m - £10m (5)	Above £10m (6)
One off costs (1)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ongoing annual costs (2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6.6 Please describe the impacts that you expect will cause the majority of costs for third party administrators.

Q6.7 Do you anticipate the Electronic Communications (Security Measures) Regulations 2020 will affect the number of suppliers that participate in your procurements?

- Yes, it will increase the number of suppliers (1)
- Yes, it will reduce the number of suppliers (2)
- No impact (3)
- Not sure (4)
- Other, please explain (5) _____

End of Block: Section 6 - Questions on Regulation 7: Supply Chain; impact on your suppliers

Start of Block: Section 7 - Questions on Regulations 8, 10, 11 and 12

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q7.1a

This section contains questions on draft regulations: 8 on 'Prevention of unauthorised access or interference'; 10 on 'Governance'; 11 on 'Reviews'; and 12 on 'Patches and updates'.

In the 2022 version of the draft regulations, regulations 11 (Reviews) and 12 (Patches and updates) have been added. Regulation 11 contains requirements from previous draft regulations on 'Prevention of security compromise and management of security permissions' (now Regulation 8) and 'Governance' (now Regulation 10). Regulation 12 is an expansion of the patching requirements included in the previous draft regulation on 'Prevention of security compromise and management of security permissions' (now Regulation 8).

Thinking about regulations 8, 10, 11 and 12 in aggregate. Have your estimates for the impact of these Regulations changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 8) (2)
- Not sure (3)

Display This Question:

If This section contains questions on draft regulations: 8 on 'Prevention of unauthorised access or... = Yes

Q7.1b What are the key changes since your previous response?

Q7.2 What are your current estimates of the one-off or implementation costs caused by draft regulation 8 on Prevention of security compromise and management of security permissions?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £10m (4)
 - £10m - £25m (5)
 - £25m and above, please specify (6)
-

Q7.3 What are your current estimates of the ongoing annual costs caused by draft regulation 8 on Prevention of security compromise and management of security permissions?

- None (1)
- Less than £500,000 (7)
- £500,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)



Q7.4 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 8.



Q7.5 What are your current estimates of the one-off or implementation costs caused by draft regulation 10 on Governance?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £10m (4)
- £10m - £25m (5)
- £25m and above, please specify (6)

Q7.6 What are your current estimates of the ongoing annual costs caused by draft regulation 10 on Governance?

- None (1)
- Less than £500,000 (7)
- £500,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q7.7 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 10.

Q7.8 What are your current estimates of the one-off or implementation costs caused by draft regulation 11 on Reviews?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £10m (4)
- £10m - £25m (5)
- £25m and above, please specify (6)

Q7.9 What are your current estimates of the ongoing annual costs caused by draft regulation 11 on Reviews?

- None (1)
- Less than £500,000 (7)
- £500,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q7.10 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 11.

Q7.11 What are your current estimates of the one-off or implementation costs caused by draft regulation 12 on Patches and updates?

- None (1)
- Less than £1m (2)
- £1m - £5m (3)
- £5m - £10m (4)
- £10m - £25m (5)
- £25m and above, please specify (6)

Q7.12 What are your current estimates of the ongoing annual costs caused by draft regulation 12 on Patches and Updates?

- None (1)
- Less than £500,000 (7)
- £500,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q7.13 Please describe which measures cause the majority of the costs included in the estimates you have provided for draft regulation 12.

End of Block: Section 7 - Questions on Regulations 8, 10, 11 and 12

Start of Block: Section 8 - Questions on Regulation 9: Preparing for Remediation and Recovery

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q8.1a Have your estimates for the impact of draft regulation 9 on Preparing for Remediation and Recovery changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 9) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft regulation 9 on Preparing for Remediation and Recover... = Yes

Q8.1b What are the key changes since your previous response?

Q8.2 What are the one-off or implementation costs caused by draft regulation 9 on Preparing for Remediation and Recovery?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £25m (4)
 - £25m - £75m (5)
 - £75m and above, please specify (6)
-

Q8.3 What are the ongoing annual costs caused by draft regulation 9 on Preparing for Remediation and Recovery?

- None (1)
- Less than £250,000 (6)
- £250,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q8.4 Please describe which measures cause the majority of the costs included in the estimates you have provided.

End of Block: Section 8 - Questions on Regulation 9: Preparing for Remediation and Recovery

Start of Block: Section 9 - Questions on Regulation 13: Competency

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q9.1a Have your estimates for the impact of draft regulation 13 on Competency changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 10) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft regulation 13 on Competency changed since submission... = Yes

Q9.1b What are the key changes since your previous response?

Q9.2 What are the one-off or implementation costs caused by draft regulation 13 on Competency?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £25m (4)
 - £25m - £75m (5)
 - £75m and above, please specify (6)
-

Q9.3 What are the ongoing annual costs caused by draft regulation 13 on Competency?

- None (1)
 - Less than £250,000 (6)
 - £250,000 to £1m (2)
 - £1m - £2m (3)
 - £2m - £5m (4)
 - £5m and above, please specify (5)
-

Q9.4 Please describe which measures cause the majority of the costs included in the estimates you have provided.

End of Block: Section 9 - Questions on Regulation 13: Competency

Start of Block: Section 10 - Questions on Regulation 14: Testing

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q10.1a Have your estimates for the impact of draft Regulation 14 on Testing changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 11) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft Regulation 14 on Testing changed since submission of... = Yes

Q10.1b What are the key changes since your previous response?

Q10.2 What are the one-off or implementation costs caused by draft Regulation 14 on Testing?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £25m (4)
 - £25m - £75m (5)
 - £75m and above, please specify (6)
-

Q10.3 What are the ongoing annual costs caused by draft Regulation 14 on Testing?

- None (1)
 - Less than £250,000 (6)
 - £250,000 to £1m (2)
 - £1m - £2m (3)
 - £2m - £5m (4)
 - £5m and above, please specify (5)
-

Q10.4 Please describe which measures cause the majority of the costs included in the estimates you have provided.

End of Block: Section 10 - Questions on Regulation 14: Testing

Start of Block: Section 11 - Questions on Regulation 15: Assistance

Display This Question:

If Did you previously submit a response to our Telecoms Security Requirements: business impact surve... = Yes

Q11.1a Have your estimates for the impact of draft Regulation 15 on Assistance changed since submission of your previous response?

- Yes (1)
- No (if no please move to section 12) (2)
- Not sure (3)

Display This Question:

If Have your estimates for the impact of draft Regulation 15 on Assistance changed since submission... = Yes

Q11.1b What are the key changes since your previous response?

Q11.2 What are the one-off or implementation costs caused by draft Regulation 15 on Assistance?

- None (1)
 - Less than £1m (2)
 - £1m - £5m (3)
 - £5m - £25m (4)
 - £25m - £75m (5)
 - £75m and above, please specify (6)
-

Q11.3 What are the ongoing annual costs caused by draft Regulation 15 on Assistance?

- None (1)
- Less than £250,000 (6)
- £250,000 to £1m (2)
- £1m - £2m (3)
- £2m - £5m (4)
- £5m and above, please specify (5)

Q11.4 Please describe which measures cause the majority of the costs included in the estimates you have provided.






End of Block: Section 11 - Questions on Regulation 15: Assistance

Start of Block: Section 12 - Methodology

Q12.1 How did you estimate the costs of implementing the draft Regulations? Where more than one method was used please indicate the approximate proportion of costs estimated with each method using the slider.

Not Applicable

0 10 20 30 40 50 60 70 80 90 100

Benchmarked against similar projects or requirements ()	
Identified changes we would need to implement and estimated costs based on costs of similar activities ()	
Estimated based on supplier quotes for provision of specific equipment or services ()	
Judgement based on reading and understanding of the Regulations ()	
Other, please specify ()	

End of Block: Section 12 - Methodology
