

30 October 2009

Peter Christodoulou  
Information Economy  
Department for Business, Innovation and Skills  
UG 21  
1 Victoria Street  
LONDON  
SW1H 0ET

Dear Mr Christodoulou,

**Re: BIS Consultation on Proposed new duties for Ofcom on Resilience: Secondary Information**

I am writing in response to the consultation document outlined above, and include some initial comments from my colleagues in Vodafone.

They would also appreciate the opportunity to meet with you to discuss the proposals in more detail as it is not yet clear to them what the real cost to the business will be with the introduction of these or similar initiatives.

Initial comments

In theory the process of providing risk assessments to Ofcom does not pose a huge problem for Vodafone, but we do have some reservations around network resilience information being accessible in the public domain. We therefore agree with the analysis that Ofcom will need to clarify further the categories of risk assessment which will be subject to the reporting requirement and would also ask where and how network resilience information will be stored.

We feel that any reporting structure would require very clear metrics i.e. how one would measure good and bad and we are not yet clear of what is in and out of scope. We would therefore suggest that further clarification and consultation on the detail of the proposal is required.

On the point about taking part in central government exercises, Vodafone is one of the few telecoms providers who always take part, but again this needs clearer definition as to the scope, because we would not for example have the resource to take part in every regional or local exercise. We would therefore like to better understand the definition of 'taking part'.

In summary, we recognise what BIS is trying to achieve, but think that further detail and analysis is required before a business decision to support this proposal can be made.

We hope this is of assistance but if you have further questions, please do not hesitate to contact Vodafone via the Government Relations team, the contact details of which are listed below.

Yours sincerely

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