



**E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301**

July 23, 2022

Office of Utilities Regulation
P.O. Box 593
36 Trafalgar Road
Kingston 10, Jamaica

Attention: Ms. Marsha Minott

Dear Ms. Minott,

**Re: Outage Reporting Protocols and Measures to
Improve Network Resiliency in Disasters**

The Consumer Advisory Committee on Utilities (CACU) is grateful for the opportunity to contribute to the regulatory consultation process regarding the Outage Reporting Protocols and Measures to Improve Network Resiliency in Disasters.

Having discussed and considered the proposed approach to streamlining the reporting protocols and improving the network resiliency during disasters, the CACU offers the following comments/observations in response to the OUR's Consultative Document.

The CACU looks forward to further engagement with the Office of Utilities Regulation (OUR) on this and other matters of regulatory importance.

Sincerely yours,

Carolyn Ferguson-Arnold

Carolyn Ferguson-Arnold (Mrs)
CACU Lead - Telecommunications

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid



E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301

Outage Reporting Protocols and Measures to Improve Network Resiliency in Disasters

General Comments:

3.3.7 - Only four (4) of the benchmark countries clearly define who is in charge of notifying an outage to the relevant authority. The outage reporting protocols of the Dominican Republic, Qatar, and Lebanon are defined within their corresponding QoS frameworks and do not specify details about the person in charge of notifying

Note for OUR: Shouldn't it be three (3) and not/not four (4) of the countries surveyed?

4.1.2 - In particular, the draft Protocol develops on paragraph 15.1 of the GCCP which states that "[L]icensees should give advance warning of anticipated service disruptions or planned outages".

Note for OUR: The sentence is either incomplete or needs to be reworded to clearly convey the point.

Responses:

4.1 Planned and unplanned outages

Question 1: Do you consider reasonable, the proposed minimum time to notify planned outages in advance? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: We agree that 48 hours' notice for planned outages is reasonable as the minimum service standard. This should give most consumers sufficient time to make the necessary arrangements to mitigate loss of electricity service. However, providers should be encouraged to give as much notice when and where possible, in order to facilitate 24 hour business operations, e.g. factories, BPO, etc. While we agree with the time period, we are of the view that it be sufficient to just say 48 hours rather than working days.

Categorization of outages based on severity

Question 2: Do you find the number of outage categories reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: The three (3) outage categories appear reasonable and aligned with best practices, as the local providers are already providing the proposed content/categories. These categories will assist affected customers in better planning their mitigating

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid



**E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301**

measures. Consumers should however be educated about the different categories so that appropriate mitigating action can be taken depending on the outage category.

4.1.11 - The OUR is of the view that criteria such as the affected network level (i.e. access or core), the number of access nodes or sites, the type of communication services or infrastructure affected (i.e. emergency services and/or critical or special infrastructures), as an outage affecting these elements may severely affect the wellbeing of citizens and key services for the country's security.

Note for OUR: The sentence is either incomplete or needs to be reworded to clearly convey the point.

Question 3: Do you find the categorisation criteria and specific thresholds used reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: Agreed that the proposed three categories of outages based on severity, are reasonable. Consideration should also be given to treatment for major and critical outages originating outside of the network and which occur as a result of two (2) common issues, e.g. accidental and/or unintended interruptions (trucks pulling down cables, etc.) and premeditated/planned disruptions (theft, etc.). Also, the OUR may consider better defining the minor outage category for both planned and unplanned outages, other than just "not deemed critical or major". For the outages, giving both a number and a percentage, it should perhaps be stated "whichever is greater". If critical is more than 100 or 20% then major should be under 100 or 20% and a minimum of 20k or 5% of customers (whichever is less).

4.2 Designation of Contact Persons

Question 4: Do you find it reasonable to designate a contact person who reports outages to the relevant authority? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: We are in agreement with the approach and would suggest that an alternate contact be nominated to ensure redundancy in the process. If the line in para 4.2.2 should address having other contact persons where it states "...specific contact persons may be identified...". It should perhaps state "additional" contact persons, rather than "specific".

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid



E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301

4.3 Reportable Outages

Question 5: Do you find the proposal that all planned outages, and critical and major unplanned outages should be reported **is** reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: All planned and unplanned outages - critical/major - must be reported to the relevant authority(ies). Providers should be encouraged to share the details on outages deemed minor. Minor outages may be reported to local authorities such as the parish council. It is expected that the customers affected by a minor outage would be notified.

Question 6: Do you find the four-step reporting process defined in the draft Protocol and its timeframes reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: We would suggest the following:

- An Initial Outage Notification must be submitted within **ninety minutes (1½ hours)** upon detecting a major or critical unplanned outage. **This additional time would allow for provision of the completion and submission of more credible diagnostic reports.**
- Outage Update Notifications must be submitted every hour in the case of critical unplanned outages and every two (2) hours in the case of major unplanned outages.
- An Outage Resolution Notification must be submitted within **two (2) hours** after the resumption of the normal functioning of the network. In the case of critical outage, service providers must notify the OUR **within an hour** after the restoration. **The suggested timelines are being proposed to ensure that the network has been successfully restored without any minor/ongoing issues.**
- An Outage Report must be submitted to the OUR no later than fourteen (14) days after the outage resolution notification.

While we are making reference to best practices, the input of the service provider will be important in confirming how reasonable the proposed timelines are. It is however necessary that the timelines are defined and not very long so as to be ineffective.

4.4 Reporting formats

Question 7: Do you find the information required at each stage of the notification process reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid



**E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301**

CACU Response: The CACU supports the information required at each stage of the reporting process, in keeping with international best practices and for detailed assessments to be conducted by the relevant authorities.

4.5. Notification to end-users

Question 8: Do you find it reasonable to notify end-users about any planned outages, and any major or critical unplanned outage? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: It is imperative that end-users/customers be advised of all planned and unplanned outages, regardless of the category of the outage. This is good customer service practice and ultimately good for business.

4.6. Draft Outage Reporting Protocol

Question 9: Do you have any other comments on the proposed Outage Notification Protocol which have not been discussed previously? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: Other than the comments made in response to other questions, the CACU generally supports this approach to outage reporting and protocols and measures to improve the telecoms network resiliency.

4.7. Resiliency Measures National Roaming during Disasters

Question 10: Do you think the proposal to include national roaming obligations in cases of disasters is reasonable? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: The CACU offers its full support for national roaming obligations during the occurrence of national emergencies and/or disasters. The approach could/would reduce high numbers of casualties and other life-threatening incidents during natural and man-made disasters. While it may be necessary for the OUR to intervene for its activation, we do not see the necessity for it to have the power to also deactivate the facility.

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid



E-mail: cacu2@our.org.jm
Mobile/WhatsApp: 876-322-9301

Emergency Mobile Roaming

Question 11: Do you think it is **reasonable** that the proposed obligation to extend the accessibility of emergency services by enabling users wishing to call an emergency number to roam on any other available network if their own service provider's network is unavailable **reasonable**? Please support your answer and any suggestions with relevant information and internal or international best-practice references.

CACU Response: General support for the proposal, although we are concerned that our local experience of misusing emergency services (reported by Police/911, Fire Brigade, etc.) may interfere with other callers with legitimate issues. This could be the difference between life and death.

Disaster plans/Business continuity plans

Question 12: Do you find the proposed provisions regarding the development, implementation, submission and updates of Disaster Plans and Business Continuity Plans reasonable? Please support your answer with relevant information and internal or international best-practice references.

CACU Response: This is especially important for Jamaica, due to climate change and our continued exposure to extreme weather patterns and conditions. While all utilities are important during a disaster, the reliability of telecommunications is an essential and important service pre and post emergency/disaster. The proposed provisions are considered reasonable and consistent with best practices.

Consumer Advisory Committee on Utilities (CACU)
July 23, 2022

Members: • Yasmin M. Chong (Chair) • Carolyn Arnold • Kadian Birch • Erwin Burton
• Devon Gayle • Paul Goldson • Gilroy Graham • Wayne Grant • Mikhail Reid