

Digicel

Digicel's Response

to

The Office of Utilities Regulation

Consultation on the

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

July 25, 2022

Preliminary Comments

We thank you for providing this opportunity for Digicel to respond to the Office's Consultation Document on the Outage Reporting Protocols and Measures to Improve Network Resiliency in Disasters. Digicel is, of course, available and would be happy to discuss our submission further.

The responses as provided herein are not exhaustive and Digicel's decision not to respond to any particular issue(s) or any particular issue(s) relating to the subject matter generally does not necessarily represent agreement, in whole or in part nor does any position taken by Digicel in this document represent a waiver or concession of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights in this matter generally.

Please do not hesitate to refer any questions or remarks that may arise as a result of these comments by Digicel to:

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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.

Digicel's Response

The 48 hours advanced notice is an ideal and a network best practice. Accommodation should be made for a 24 hours' notice period for 'emergency planned' outages that are required to prevent greater failures.

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.

Digicel's Response

The three (3) tier outage categories are reasonable and require no further comment from Digicel.

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.

Digicel's Response

YES. Ultimately the determination of the measurement should be dependent on network configuration (# of nodes, sites, customers etc.) with reference to geographic and demographic impacts.

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.

Digicel's Response

Digicel will from time to time designate a special point of contact. It should be noted, however, that the personnel involved in network restoration will not necessarily be the same individuals involved in the management of communication with the Office.

Question 5

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

Digicel's Response

Yes for critical, major, planned and unplanned outages being reportable is reasonable.

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.

Digicel's Response

There are a few issues with the four-step reporting process. We seek clarity on the following:

- a. What is the almost immediate notification to the Office seeking to achieve?
- b. Does the Office operate on a 24hr basis like the service providers or will someone be appointed to receive these notifications on a 24/7 basis?

Any requirement to provide outage details to include the six (6) areas identified under the Initial Outage Notification would be burdensome IF information is required in the first hour. The initial period is usually reserved for quick investigation and resource mobilisation to resolve the identified issues. Reports in this first period would be too onerous and counterproductive.

Further, this will require a system in place to support timely notifications inclusive of agreeing to a format of notification.

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.

Digicel's Response

They are reasonable to an extent, the timeframes for notifications remain a concern to Digicel.

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.

Digicel's Response

Yes, this is reasonable. We believe however, that the method format and frequency must be agreed between the Office and the service providers.

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.

Digicel's Response

There are no additional recommendations at this time.

Question 10

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

Digicel's Response

YES, however, it requires commercial discussions and approval.

Question 11

Do you think 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.

Digicel's Response

YES. This is reasonable, however, it would require a commercial discussion and approval.

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 and any suggestions with relevant information and internal or international best-practice references.

Digicel's Response

This is an unreasonable request. Business continuity plans are confidential and contain proprietary information, disclosure of which may impact competition and may have security concerns.

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