

Dear Sir or Madam,

Please find below some brief comments on the ARECI-study from Deutsche Telekom's point of view.
We would like to comment on the recommendations on page 16 ff. as follows:

ad 2 "Priority Communications on Public Networks":

In Germany these requirements are already met by existing regulations (Post and Telecommunications Security Act). However, the German solution is not standard-based. The GSM-standard relating to the access classes has turned out to be not feasible. Therefore it is currently not applied. Instead there are proprietary solutions which have proven to be practicable. Furthermore we do not see the necessity for a EU-wide cross-border standard, because bottlenecks usually have local dimensions.

ad 3 "Formal Mutual Aid Agreements":

We appreciate this recommendation. In Germany we already have a cooperation in the private sector (e.g. Implementation Plan for IT-Security in Critical Infrastructures - UP KRITIS).

As far as emergency call (112) is concerned the government has issued a legislation proposal for specific provisions for mobile services, that the emergency service should be open to users of other mobile networks. We consider this demand as reasonable and support it.

A general national roaming in critical situations should not be established. According to analyses national roaming could have a counterproductive effect, if in case of a crisis users try to compensate network failures by concentrating on the remaining networks (and thus create an overload). Besides national roaming would face technical obstacles.

ad 4 "Critical Infrastructure Information Sharing":

Cooperation on management level is appreciated and already established in Germany, e.g. UP KRITIS (see above). From our point of view there is no need for further "formal means for sharing information". At least it should be left to the member states whether the existing practice of information sharing on a voluntary basis is considered to be sufficient or formal means are necessary.

ad 5 "Inter-Infrastructure Dependency":

We refer to UP KRITIS, the focus of which lies especially on cross-sector cooperation.

ad 6 "Supply Chain Integrity and Trusted Operation":

A sustainable implementation of the proposed requirements would be very complex and costly for the private sector and therefore requires a broad sponsoring by the member state .

ad 7 "Unified European Voice in Standards":

We consider this non-problematic, unless there are no competing concerns of individual network operators.

ad 9 "Vigorous Ownership of Partnering Health":

We refer to UP KRITIS. At any rate a broad sponsoring of the member state would be beneficial to strengthen public-private partnerships.

Kind regards,

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Legal Obligations

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