

EURespond Position Paper

Final Report on the Availability and Robustness of Electronic Communications Infrastructure

May 2007

I. Introduction

EURespond welcomes the attention bestowed upon the issue of **Critical Infrastructure**, notably in the field of Electronic Communications, as we believe this issue merits increased focus. EURespond therefore considers the Final Report on the Availability and Robustness of Electronic Communications Infrastructure (hereafter the “ARECI Study”) an interesting step in this process.

EURespond is an alliance of individuals, NGOs, regions and corporations who are working together to provide Europe with **easy-to-use, resilient, and ubiquitous communications systems** that are beyond the reach of natural or man-made disasters by providing robust **Emergency Response** solutions, reach currently underserved areas of Europe with state-of-the-art connectivity, and hence bridge the **Digital Divide**, and support European efforts to protect **Critical Infrastructure**.

EURespond therefore urges the European Commission to continue and enhance its dialogue with all interested parties on these issues, and hopes that the Forum’s own efforts will help contribute constructively to that dialogue.

We thank you in advance for taking consideration of these views. Feel free to contact Richard Nash at the EURespond secretariat, by phone +32 2 503 4118 or email Richard.Nash@eurespond.org should you need further information.

II. Specific Remarks on the ARECI Study

EURespond believes this study provides an excellent basis for discussion in several important policy areas that the Commission will pursue in coming months. However, we urge the Commission to assess whether some of the definitions used in the study are helpful or whether discussions should revert to more established terminology. For example, “robustness” does not seem to be a widely used term in industry and, though the study authors give a detailed summary of the term in the introduction, the study does not actually examine “robustness” to any great extent.

- a) A European Focus with a Global Awareness

EURespond supports the **guiding principles to the ARECI Study** and notably the principle “*to uphold a European focus, yet maintain **global awareness***”.

Indeed, if one looks at two recent disasters, one natural and the other man-made, it brings to the fore the similarities between requirements of incident management techniques and resources for both kinds of disaster recovery operations. The London bombings of 7 July 2005 and US Hurricane Katrina of August-September 2005 both highlight the near total collapse of telecommunications services. The causes were distinct, yet the results were similar.

Although widely divergent in their characteristics, the London bombings and Hurricane Katrina both gave rise to communications problems that are fundamentally similar. These common problems can be summarised as follows:

- Emergency communications systems were **incapacitated** following the events, leading to lack of coordination between emergency personnel and hence increasing response time.
- Heavy **reliance** of emergency personnel upon existing **cellular mobile technology** meant that when mobile systems crashed, communication became very difficult.
- Lack of **planning** for effective alternatives caused unprecedented communications blackouts in the absence of viable alternative means of communications.
- **Satellite** communications networks could prove to be viable alternatives to the failed primary communications systems but they were either unavailable or, where present, personnel could not use them due to lack of training.
- Lack of **interoperability** between first responders due to non-interoperable communications technology being used by different emergency services agencies.

EURespond also agrees with the finding of the ARECI Study that “European industry stakeholders view the United States communications industry as having valuable emergency preparedness and disaster recovery experience” and believes any dialogue addressing these issues should be held on a global basis.

b) Varying Levels of Awareness

EURespond shares the Study’s concern that “*some of the countries that have not experienced a recent disaster have a low expectation that one can occur in the future, and thus they do not plan nor invest for dealing with such a crisis*”. This reality is probably at the heart of the creation of EURespond, one of its main objectives being to **raise awareness** with policy makers and other relevant decision makers of the issues that are at the core of EURespond, including Critical Infrastructure and Emergency Response.

EURespond is therefore willing to engage in any effort that helps increase the levels of awareness within both the private and the public sectors.

c) Need for Increased Harmonization

EURespond agrees with the different findings in the ARECI Study in terms of lack of **harmonization**, both in terms of disaster recovery arrangements across national boundaries, standards, and general policy and regulatory frameworks.

EURespond therefore supports any measures stemming from this Study or from other initiatives that would lead to an increased harmonisation of approach towards these important issues and cross-border cooperation.

d) Market Forces' Role

EURespond does not fully agree with the statement made by the Report that *“Because the primary stakeholder for priority communications capabilities is the government, normal market forces are not at play and do not produce sufficient motivation for the Private Sector to invest in their development, deployment and maintenance. Therefore, the most crucial commitment is that the Member States are allocating funds to support such investment by the Private Sector.”*

EURespond notes there are niche players that are willing to offer many, if not all of the services need to fill the gaps identified by the ARECI Study in terms of preparedness, resilience and prioritization. However, in most cases, ultimate resilience can only be offered through satellite communications applications (that are by nature independent from terrestrial disasters and hence “disaster-proof”) which need access to spectrum. Certainly ensuring that processes that contribute to such access to spectrum fully take into account public policy and protection needs such as those identified in the ARECI Study should be one of the Recommendations.

In addition, EURespond also points out that many large electronic communication operators have Universal Service obligations, which means that network resilience has to be maintained. Private sector players do work on resilience issues, not merely for natural disasters, but also because they have major clients such as banks or national health authorities, where extremely confidential financial and health information is being stored or being sent across the network, and needs to be protected. In certain circumstances, fixed-line networks could also be used to back up mobile networks.

III. Conclusion

A reliable telecommunications system needs to address the requirements of a well-structured preparedness system, wherein communications should be fast and efficient during extreme conditions.

The enhancement of resilience requires ongoing and strengthened dialogue between all interested stakeholders public and private, and a clear will to allocate the needed resources to ensure that resilience is in place at all levels as soon as possible and on in a harmonized manner.

The ARECI study is an extremely useful examination of several issues that will be addressed in specific European Commission policy initiatives in the coming months. We urge the Commission to use the study and the comments from other stakeholders in this consultation to progress such discussions in a constructive manner.