

ICP-ANACOM'S REPLY  
TO THE CALL FOR COMMENTS  
MADE BY THE EUROPEAN COMMISSION ON THE FINAL  
REPORT OF THE STUDY ON THE  
AVAILABILITY AND ROBUSTNESS OF ELECTRONIC  
COMMUNICATION INFRASTRUCTURES

In general terms, ICP-ANACOM agrees and supports the content and the major part of the recommendations that are presented in the study, nevertheless ICP-ANACOM would like to recommend that the Commission, following the work that has been achieved:

- Considers conducting a cost/benefit analysis on the adoption of the recommendations at an European level;
- Considers making a clarification on its assessment of the points of liaison between this study and the revision of the regulatory framework for electronic communications;
- Considers promoting the establishment of procedures and fora that encourage the relevant information sharing related to electronic communication infrastructures among Member States authorities.

In complement to this general comment on the study ICP-ANACOM would also like to present that the adoption of the recommendations calls for:

- a clear definition of the criteria that will be used in the identification of associated levels of vulnerability and the different interdependences between infrastructures;
- a clear identification of the minimum security requirements and the responsibility of the electronic communications operators and service providers;
- an assessment of what should be developed regarding standardization and harmonization at an European level;
- a coherence with the relevant network and information security policy;

- a proper consideration to the role played by the terminal equipment in the overall network and information systems security;
- an assessment of the financial and operational impact following the adoption of the recommendations;
- a clear definition for each recommendation of what are the roles and responsibilities of the different agents.

ICP-ANACOM also would like to refer that it has have given further notice that the Commission was making a call for comments on this study to the electronic communications network operators and service providers active in Portugal as a way to raise awareness in the subject matter.

Finally ICP-ANACOM would like to reaffirm its willingness in cooperating and participating in the further work that the Commission will decide to entail in this subject matter.