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**Sent:** mercredi 16 mai 2007 15:35

**To:** VARDAR Fuat (INFSO)

**Subject:** RE: Call for comments on the report of a study on the availability and robustness of electronic communication networks

**Importance:** High

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France Telecom Group welcomes very warmly the Commission initiative on critical infrastructures and would like to suggest the following remarks to the 10 proposed recommendations

#### **4.1 Emergency Preparedness**

##### Recommendation 1

The Private Sector and Member State governments should jointly expand their use of emergency exercises and establish pre-arranged priority restoration procedures for critical services to better meet the challenges of inevitable emergency incidents.

France Telecom Group support this recommendation since such preparations and emergency exercises already exist in most of the State Members.

Pre-arranged priority restoration requirements should be defined by Member States and Private sector should let be free to use the best of its knowhow

to meet those requirements. It is also important to outline how important are the careful studies of the inter-dependencies between stakeholders.

Debriefing and lessons learned are key.

#### **4.2 Priority Communications on Public Networks**

##### Recommendation 2

Member State governments should implement a standards-based priority communications capability on future public networks in order to ensure vital communications for critical government authorized callers. This public network capability is needed in addition to any private emergency networks that already exist and should not be viewed as a substitute or replacement for such private networks.

Member should not "implement" but rather "authorize" standard-based priority capabilities.

Another alternative would be to have a dedicated emergency network owned by a Member State (even if the operations are delegated to an Operator) onto which all Operator could connect their own operations. Such an emergency network is a good candidate subject for research activities and European projects.

### **4.3 Formal Mutual Aid Agreements**

#### Recommendation 3

The Private Sector should establish formal mutual aid agreements between industry stakeholders to enhance the robustness of Europe's networks by bringing to bear the full capabilities of the European communications community to respond to crises.

In order to allow for such a mutual aid in an effective way it is more than necessary that precise standards are developed and moreover that the equipment provider conform precisely to that standards. Existing standards are too fuzzy mainly in the IP World.

### **4.4 Critical Infrastructure Information Sharing**

#### Recommendation 4

Member States and the Private Sector should establish formal means for sharing information that can improve the protection and rapid restoration of infrastructure critical to the reliability of communications within and throughout Europe.

These means should warranty the information confidentiality.  
There is a lot to do insure such an info protection.  
This is a second good candidate for European research.

### **4.5 Inter-Infrastructure Dependencies**

#### Recommendation 5

European Institutions and Member States should engage with the Private Sector to sponsor a coordinated European-wide program that identifies and addresses the interdependencies between the communications sector and other critical sectors, to enhance the availability and robustness of Europe's public communications networks.

France Telecom Group is fully supporting this recommendation.  
Since this is a matrix approach lot of European resource should be put in that program.

### **4.6 Supply Chain Integrity and Trusted Operation**

#### Recommendation 6

European Institutions and Member States should embark on a focused program to promote the integrity of supply chains used to build network systems, and promote the implementation of innovative trust concepts to support the operation of these systems. The program should focus on articulating a vision, providing incentives for research and development, and establishing policies affecting government procurement contract awards.

This is a third good candidate for European research programs. Another concept which could be investigated could be the "trusted service over untrested networks" one. One must find a way to deselect network component which would not be "emergency" compliant (by mean of standard compliance certifications).

#### **4.7 Unified European Voice in Standards**

##### Recommendation 7

Member States should consider opportunities to coordinate positions during standards development, since a unified voice can give the European Union members more leverage in addressing concerns of mutual interest to the members. The Member States should coordinate the selection of standards bodies in which to actively participate. Member States should agree on which standards to follow to minimize conflicts.

In that respect, Member States should heavily consult Critical Infrastructure Operators and rely on them to select the standard bodies (one or two would be enough) which would be relevant. Here also Operators are looking for precised standards.

#### **4.8 Interoperability Testing**

##### Recommendation 8

The Private Sector and Member States should develop an industry-consensus, standardized, network-to-network testing framework to ensure that a rigorous set of tests are performed prior to interconnecting new network to existing networks.

France Telecom Group is strongly supporting this recommendation. This framework should obviously been agreed by a majority of the Network Operators. France Telecom Group, due to its large presence in the different Member States, propose to manage part of the proposed "network-to-network testing framework". It is not only "new networks" which are at risk but also "new component" of existing networks.

#### **4.9 Vigorous Ownership of Partnering Health**

##### Recommendation 9

European Institutions, Member States and the Private Sector should re-invent their approach to collaborating and embrace a mind-set of unilateral responsibility for the success or failure of critical public-private partnerships.

This is a good idea as soon as the different parties are playing and treated in equity.

#### **4.10 Discretionary European Expert Best Practices**

##### Recommendation 10

European Institutions and Member States should encourage the use of discretionary, industry-consensus Best Practices to promote the availability and robustness of Europe's electronic communications networks. The Private Sector should contribute its expertise to industry Best Practice collaboration and implement the resulting Best Practices, where appropriate.

France Telecom Group agrees with this last recommendation as long as it respects the unique knowhow of the Service and Network Operators.  
This is very important in a competitive world.

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