A public consultation document issued by the
Telecommunications Regulatory Authority of the
Kingdom of Bahrain

**Telecom Emergency Response Plan**

3rd May 2021
CSD/0521/018

The address for responses to this document is:

Cyber Security Directorate
Telecommunications Regulatory Authority ("The Authority")
PO Box 10353, Manama, Kingdom of Bahrain

Alternatively, e-mail responses may be sent to the
Cyber Security Directorate’s email address at [CSD@tra.org.bh](mailto:CSD@tra.org.bh)

The deadline for responses is Thursday, 10th June 2021.
Instructions for submitting a response

The Telecommunications Regulatory Authority (“the Authority”) invites comments on this consultation document from all interested parties. Comments should be submitted no later than 4 pm on Thursday, 10th June 2021.

Responses to this document should be sent to:

Cyber Security Directorate
Telecommunications Regulatory Authority
P.O Box 10353
Manama, Kingdom of Bahrain
Email address: CSD@tra.org.bh

Responses should include:

➢ the name of the company/institution/association etc;
➢ the name of the principal contact person;
➢ full contact details (physical address, telephone number, fax number and e-mail address); or
➢ in the case of responses from individual consumers, name and contact details.

The Authority expects respondents to provide comments in response to each of the questions set out in this document. The Authority invites respondents to substantiate their response, wherever possible, by providing factual evidence to support their responses.

In the interest of transparency, the Authority will make all submissions received available to the public, subject to the confidentiality of the information received. The Authority will evaluate requests for confidentiality in line with relevant legal provisions and the Authority’s published guidance on the treatment of confidential and non-confidential information.

Respondents are required to clearly mark any information included in their submission which is considered confidential. Where such confidential information is included respondents are required to provide both a confidential and non-confidential version of their submission. If a submission is marked confidential in its entirety, reasons for this

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1 The Authority, “A Guidance Paper issued by the Telecommunications Regulatory Authority on its treatment of Confidential and Non-Confidential Information; Guidance Paper No.2 of 2007, 10 September 2007
should be provided. The Authority may publish or refrain from publishing any document or submission at its sole discretion.
SECTION 1

Status of this consultation document

1. This section is intended to provide a brief overview of the background to this consultation.

2. This consultation document is issued pursuant to the Position Paper on “How TRA Consults” issued by the Authority on 17 October 2017.

3. The information contained in this consultation document is intended to provide background on the Telecom Emergency Response Plan (the “Plan”) that is currently being considered by the Authority. Interested parties should not take any actions in reliance on the information or proposals contained in this consultation document. Any views set out in this consultation document should be considered as indicative and will be subject to further consideration following the receipt of comments from interested parties.

4. This consultation document does not represent a decision by the Authority. The issues discussed in this document remain open to consideration and should not be construed as indicating that the Authority has formed any final opinion or decision on the Consumer Protection Regulation.

SECTION 2

Background Information

1. The Authority is the independent regulator and competition authority for the Kingdom of Bahrain telecommunications industry and is empowered under the Telecommunications Law of the Kingdom of Bahrain Legislative Decree No. 48 of 2002 (“the Telecommunications Law).

2. Article 3(b)(1) of the Telecommunications Law stipulates that the Authority undertakes in carrying out its duties relation to Telecommunications services in the manner best calculated to protect the interests of Subscribers and Users in respect of, availability and provision of services.

3. In fulfillment of its duties, and in accordance with Article 3(e) of the Telecommunications Law which stipulates that the Authority shall act in a manner that is consistent with the objectives of the National Plan for Telecommunications, the Authority published the Critical Telecommunications Infrastructure Risk

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Management Regulation\(^3\) with the objective of ensuring that the sector remains resilient to any cyber and/or physical attacks and is ready to mitigate any disaster or emergency.

4. Telecommunications services can play a crucial role during disasters or emergencies by enabling the dissemination of alerts and can support in the coordination of rescue and relief operations, therefore it is crucial to ensure that Critical Telecommunication Infrastructure and/or Services are operational during any national disaster or emergency.

5. To that end, and in accordance with the objectives and aims of the Government’s National Telecommunications Plans\(^4\) 4 and 5, the Authority has set out a documented plan which lays the foundation for effective emergency and resilience planning across the Telecom Sector, which would in turn enable and ensure the operability and availability of Critical Telecommunications Infrastructure and/or Services during any emergencies.

6. Below is a brief summary of the Plan:
   
   - The section titled ‘Telecom Emergency’ sets out the possible disasters which could amount to a Telecom Emergency.
   
   - The section titled ‘Triggers and Notifications’ sets out scenarios where Licensee’s representatives must notify the Head of the ERC.
   
   - The section titled ‘Information Flow and Sequence of Events’ sets out the process to be followed in the event of a Telecom Emergency.
   
   - The section titled ‘Roles and Responsibilities’ sets out the roles and responsibilities of all the relevant parties during the:
      
      i. Mitigation Phase;
      
      ii. Preparedness Phase;
      
      iii. Response Phase; and
      
      iv. Recovery Phase.

7. The Authority seeks comments from stakeholders in the telecommunications industry, the business community and the general public (“the Respondents”) on the Plan (attached herein as Annex 1) by providing answers to the questions in


Section 3 of this document. All comments should be supported as much as possible by detailed explanation, including, where relevant, references to the specific provisions of the Telecommunications Law or Licences that Respondents are relying upon.

8. Capitalized terms used throughout this document shall have the same meaning attributed to them by the Telecommunications Law and/or the Plan.
SECTION 3
Consultation Questions

Definitions
1. Do you agree with the proposed definitions?
   Please provide justifications to your answer.

Objective & Scope
2. Do you agree with the objective of this Plan?
   Please provide justifications to your answer.

Telecom Emergency
3. Do you agree with the list of instances that can lead to a Telecom Emergency?
   If not, please give reasons and state which instances you think should be added, or omitted?

Triggers and Notifications
4. Do you agree with the notification period of 30 minutes?
   If not, please give reasons why you think the duration for notification should be revised?

5. Do you agree with the list of Incidents that could be considered as Telecom Emergency or Imminent Telecom Emergency?
   If not, please state why you disagree and with Incidents should be added, omitted, or amended.

Information Flow and Sequence Events
6. Do you agree with the Information Flow and the sequence of events to handle a Telecom Emergency?

Mitigation Phase
7. Do you agree with the proposed Emergency Response & Restoration Plan as per Mitigation Phase?
   If no, please specify the concerns along with the reasons.

8. Do you agree with the proposed requirement to submit an Emergency Response & Restoration Plan within 3 months of publication of the Telecom Emergency Response Plan and the requirement to update it periodically?
   Please provide justifications to your answer.
9. Do you agree with the proposal to sign the draft MoU as per Appendix D?

10. Please provide justifications to your answer. Do you agree with the proposed responsibilities listed under Mitigation Phase?
    If no, please specify the concerns along with the reasons.

Preparedness Phase

11. Do you agree to conduct Internal Drills within the period of 9 months of publication of the Telecom Emergency Plan?
    If not, please specify the concerns along with the reasons.

12. Do you have any concerns in implementing the Common Alert Protocol to assist in alerting and disseminating information regarding disaster or emergency?

13. Do you have any concerns to allow Domestic Roaming during the Telecom Emergency? If yes, please state it with reasons.

14. Do you have any concerns on the Licensee requirements under preparedness Phase? If yes, please provide reasons.

15. Do you have any concerns on the overall timelines specified as per figure 5? If yes, please provide reasons.

16. Do you have any concerns on the responsibility matrix in Table 1? If yes, please provide reasons.

Response Phase

17. Do you agree to the responsibilities of Licensee, ERC and Authority mentioned under the response Phase?
    If no, please specify the concerns along with the reasons.

Recovery Phase

18. Do you have any concerns in submitting a post-emergency report and providing a de-brief within 2 weeks? If yes, please provide reasons.

The Sector Emergency Response Committee Structure

19. Do you agree with the structure of the ERC?
    If not, please state why you disagree and what profile / team member in the ERC structure should be added, omitted, or amended?