

Consultation Response

IGT140: Changes to the IGT Panel Rules

Responses invited by: 16 OCT 2020

Respondent Details
Name: Rebecca Cailes
Organisation: BUUK

Support Implementation	<input type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input checked="" type="checkbox"/>

Please briefly summarise the key reason(s) for your support / opposition

Whilst BUUK are supportive of the reasons behind this modification and support the need to create a mechanism that maintains the IGTUNC Panel and it's ability for the representative Panel for both Users and Operators to effectively make decisions and progress change, with a reduced membership and avoiding the need to reconvene meetings. However, we have fundamental issues with the mechanism for achieving this and believe the new quoracy rules are inferior and not an equitable process for Users and Operators.

BUUK disagree with the intent to treat IGTs differently on the basis the IGTUNC is a code for IGTs. Despite discussions at Workgroup where we challenged the lack of equitability and therefore lack of future proofing, no amendments were introduced, and our concerns were dismissed. The principle of the modification is correct, but in practice it is flawed; the same rules should have been applied to IGTs irrespective of whether IGTs had suffered difficulty in gaining representation; in the future this may also be the case for IGTs.

Reference was made to IGTs having a mechanism through the Independent Networks Association (INA) to ensure representation. The INA is association; it is not mandatory to attend and whilst Panel representation is discussed and nominations are approved for constituency Panel positions, attendance is not mandated.

The quoracy arrangements set out in this modification are also inferior to the status quo. Currently if a meeting is deemed to be non-quorate, it can be reconvened at a different date with an alternate quoracy (all those in attendance deem meeting to be quorate) which creates a fluid and timely process. This ensures Panel meetings can go ahead to deliver the required changes. This proposal and process appears to be hindered as has the same quoracy arrangements for both standard and reconvened meetings (albeit with the introduction of a Proxy Vote), which allows meetings to be reconvened multiple times until the quoracy is met. With the busy schedules of most Panel members and conflicting pressure on resource, there is a risk of delay for decision making.

At BUUK, we recognise the issue and are proactive in encouraging representation, but we cannot make, in our view, a substandard change.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

BUUK agree that IGT140 should not be a self-governance modification and requires Authority approval.

Please state any new or additional issues that you believe should be considered

BUUK do not believe there are any new or additional issues that should be considered.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

The modification would go some way to promoting the implementation and efficiency of administration for the code (F).

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

Re-convening of meetings may incur additional costs if quoracy rules are not met.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We do not support the modification so no comment here. Had the modification been amended and BUUK were in a position to support, it could have been implemented on the next scheduled or extraordinary release date.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Further Comments

Is there anything further you wish to be taken into account?

Nothing in addition to points already raised.

Responses should be submitted by email to IGTUNC@gemserv.com