

## Consultation Response

# IGT173: Gateway Delivery for RPC Backing Data

Responses invited by: 17<sup>th</sup> April 2024

### Respondent Details

Name: Charlotte Gilbert

Organisation: BUUK

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

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

We support this Modification as it provides consistency to Shippers in receiving RPC backing data.

This support is qualified as we believe that we should not bare the costs due to already having a robust process in place through our portal, therefore this could be seen as a retrograde from our current portal, in particular if the IX went down and we would have to use encrypted emails.

Our qualified support also points towards the necessity of the post-implementation reviews taking place.

### **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?**

We agree with the Proposer’s view that this Modification should be Self-Governance as this is simply changing a process for sending through files.

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

None

### **Relevant Objectives**

**How would implementation of this modification impact the relevant objectives?**

We agree that this Modification has a positive impact on relevant objective (F) by aligning the method of delivery.

### **Impacts and Costs**

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

This Modification will see us having to change how we process backing files. Currently we use our purpose built portal for Shippers.

**In addition please note the IGT UNC Panel discussion in the Draft Modification Report (pages 9 and 12) on the matter of cost allocation.**

We believe that Shippers should be bearing the cost of this change, as beneficiaries of it. BUUK already have a robust process to deal with backing data that we would have to deviate from.

## **Implementation**

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

See below.

**In particular the IGT UNC Panel are interested in whether you are in support of a November 2024 release for this Modification or would you require a 6 month lead time and therefore a February release?**

We would be prepared to work for a November release, though understand others may require the 6 month lead time as so are happy with the February release also.

## **Legal Text**

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

Yes.

## **Additional Question from the IGT UNC Panel RE Testing**

**Would you like testing to be available prior to implementation and would you wish to participate if it was available?**

We believe that testing is an important step in this Modification's implementation, and we would like to participate in it.

## **Further Comments**

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

This Modification will require us to have robust Shipper contacts to be able to deal with issues, and vice versa for Shippers to be able to contact IGTs effectively.

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**