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Paper Reference:	OPSG_58_0510_02
Action:	For Information

MP093 lessons learnt

1. Purpose

The Operations Group (OPSG) has previously raised concerns over the implementation of [MP093 'Implementing IRP511 and CRP535 to support GBCS v3.2 devices'](#). This paper presents SECAS's conclusions following our investigation into this matter, for the OPSG's information.

2. Summary of the issue

MP093 was raised to progress a batch of Issue Resolution Proposals (IRPs) passed over from the Technical Specification Issue Resolution Subgroup (TSIRS). This modification was implemented in the November 2020 SEC Release. The corresponding Communications Hub firmware changes were subsequently deployed by the DCC in early 2021, which is when Suppliers were able to test the relevant changes.

At the May 2021 OPSG meeting, several members raised concerns over the implementation of MP093. Members highlighted a difference between the requirements and design documents produced in the Refinement Process and what was implemented by the DCC. These issues related to the changes made for CRP535 'Restoring removed Devices from the HAN', specifically around the behaviour of the N25 'Potentially Unsuccessful Communications Hub Function Whitelist Update' Alert. The DCC's Impact Assessment performed under MP093 did not highlight any changes to the behaviour of this Alert. However, following implementation, Suppliers highlighted that behaviour of this Alert had changed.

Members were also concerned that there seemed no process to resolve issues such as this when a change does not align with Users' expectations or the business requirements. Members were also frustrated that the DCC's approach on this issue was issue guidance for a workaround, which they considered went against the original requirements of MP093 and has impacted on their operational processes.

3. Lessons learnt

3.1 Discrepancy under MP093

As part of MP093's assessment, the DCC made around Device behaviour. During implementation, these assumptions were shown to be incorrect.

Having reviewed the scenario with BEIS, we believe the highlighted issue has arisen from a niche scenario. It is highly unlikely that this scenario would have been identified solely through reviewing the associated documentation, and instead would likely have required specific testing to be identified. As the DCC's Impact Assessment would not have involved such testing, we consider it reasonable that this case wasn't highlighted at that time. In the future, we consider that some form of User or DCC testing is needed to validate the requirements prior to implementation.

The issue may also have been further exacerbated by the staggered approach taken to implement CRP535. MP093 progressed the SEC changes, which went live in November 2020 alongside the Data Service Provider (DSP) system changes. However, the Communications Service Provider (CSP) changes had been implemented in November 2019, which included introducing a memory function into Communications Hubs.

3.2 Assessing IRPs under the SEC modification

As part of our review, we also examined any wider improvements to the review of IRPs under SEC modifications that could be made.

The modification's solution and the DCC's Impact Assessment was based on the documentation provided by the TSIRS. The SEC modification documentation would have been considered by the Working Group and through industry consultation. However, changes passed over from the TSIRS are often highly technically, and the industry participants normally inputting under the SEC often won't have the technical expertise required to make a full assessment of these.

We also believe there may be a perception among Parties that because BEIS has given the go-ahead for an IRP through the TSIRS's decision, the changes should be taken as read and implemented without much further assessment. As such, these changes may not receive the same scrutiny by the Working Group and industry Parties as other modifications, which we believe may have been the case for the CRP535 changes.

We consider there would be benefit in someone from the TSIRS attending the Working Group for any future IRP modifications. This representative can discuss the IRPs with members and ensure there is full clarity on the intention of the change and any wider context. This will support the Working Group in its assessment of the changes.

Since MP093's progression, we have also introduced greater Technical Architecture and Business Architecture Sub-Committee (TABASC) scrutiny of any modifications impacting the business and technical architecture. The TABASC will now comment on relevant modifications' business requirements prior to any DCC Assessments and will review the responses subsequently produced by the DCC and the legal text for the modification. IRP modifications, such as MP093, will be subject to this scrutiny going forward.

We also note that the TSIRS doesn't usually consider the wider costs and impacts of resolving an identified issue when determining if it should be resolved. We are therefore now ensuring the Working Group and the Change Board give more consideration to the business case for IRP modifications, especially those that will incur large costs due to needing DCC System changes.

3.3 Oversight of IRPs

Looking more widely, we note the split in governance, with the TSIRS being a BEIS-led group and the modifications framework sitting under the SEC Panel. SECAS is not usually involved in the design of

IRP solutions developed at the TSIRS, and for the reasons above there is usually no reassessment done under the SEC modification framework.

We are currently looking at whether the TSIRS should become a subgroup under the TABASC. This would allow IRPs to be progressed and assessed end-to-end under a single governance structure. This would allow for a more holistic, joined-up approach to assessing and subsequently progressing these changes.

4. Recommendations

The OPSG is asked to **NOTE** the findings set out in this paper.

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28 September 2021