



**WDC Submission to Call for Feedback on  
Mobile Phone and Broadband Taskforce: National  
Stakeholder Forum**

**To**



**Roinn Cumarsáide, Gníomhaithe  
ar son na hAeráide & Comhshaoil**  
Department of Communications,  
Climate Action & Environment



**Department of Rural and  
Community Development**

*An Roinn Forbartha  
Tuaithe agus Pobail*

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The WDC welcomes the opportunity to provide feedback on the recently held Mobile Phone and Broadband Taskforce stakeholder forum.

At the outset, the WDC wishes to note its support for the speedy implementation of the NBP as the solution to providing all citizens with a future proofed telecommunication solution.

While many concerns were raised, as requested, the WDC will highlight one particular concern, raised at the plenary and subgroup session but also raised by the WDC approximately five years ago.

**The issue of access to state owned telecommunication infrastructure, particularly MANs, by regional and rural telecommunications providers was again expressed at the plenary session and the subgroup which I attended.**

As a key component of the state's telecommunications assets, funded by the State, on an open access basis, it is important that the MANs and indeed all state owned infrastructure are actually deployed on a fair, equitable and open access basis to all providers.

This will help to ensure that more citizens benefit from this infrastructure especially in regional and rural locations where there may be fewer providers.

In the WDC report, [Connecting the West, Next Generation Broadband in the Western Region](#) (2012) it was clear that at that time that some providers in regional and rural locations found the cost of accessing MAN infrastructure prohibitive. In that report I noted the importance of better regulation; (pgs 34,35)

*In its role in promoting competition, the regulator has a particular responsibility in those areas with few if any market players and more limited competitive activity. Regulation should aim to improve access to infrastructure and induce market entry, particularly by smaller industry operators in regional locations. In particular lower cost access to State owned networks could induce greater use and incentivise competition especially in areas where there is currently limited if any competition.*

*The current situation seems to be that smaller industry players can find the cost of accessing existing state-owned networks prohibitive. Regulation supporting more competition and a pricing model based on a greater number of industry operators paying lower network costs, rather than fewer operators paying higher network costs, could yield better returns on Government investment and provide more services at regional and local levels.*

It is of concern that this issue is still being raised by so many providers both in the plenary session and the subgroup session which I attended.

I understand that there is a review on the regulation of the MANs underway within the Department of Communications, Climate Action and Environment.

It would be very important to ensure that the proper frameworks and regulation to ensure open access to the MANs on a fair and equitable basis are put in place.

This is even more important now as we are preparing to invest more state funding to deliver on the NBP, now limited to just two bidders.

**The current review needs to fully revisit the regulation of MANs as State funded and owned infrastructure** so as to ensure a proper regulatory environment supports all providers in accessing state owned infrastructure and supports delivery of services to all especially those in rural and regional areas with limited competition.

If there are any queries on this submission please contact Deirdre Frost, Policy Analyst, [deirdrefrost@wdc.ie](mailto:deirdrefrost@wdc.ie)