



WDC Submission to Call for Input
National Broadband Plan – Mapping Consultation

To Communications Policy Division
Department of Communications Energy and Natural Resources

February 2015

Western Development Commission
Dillon House
Ballaghaderreen
Co. Roscommon
Tel: 094 986 1441
Fax: 094 986 1443
Web: www.wdc.ie

The WDC provided responses to those questions only within its remit and expertise.

Question 2, Section 5.3. Do you agree that a minimum threshold for upload speed performance of 10 Mbps should be included in the NGA assessment criteria. Please provide proposals and supporting information to substantiate your answer.

WDC: The key criteria for a minimum threshold should be the capacity of that minimum to deliver services required. A key driver for greater upload speeds has been for those applications which require (1) higher upload and download speeds than is currently available and (2) applications requiring greater symmetry in both up and download speeds such as video-conferencing. A minimum upload of 10Mbps with equivalent or higher download should facilitate such applications now. The extent to which this upload will be sufficient to deliver new, not yet widely available applications is difficult to determine.

Question 4, Section 5.4 What assessment criterion can practically be applied to assess the affordability of a service so that it can be classified as an NGA service? What information and assurances should operators be required to submit in relation to this criterion?

WDC: The basic premise of ensuring affordability is that next generation services are to be available universally. This is the basic rationale for the State intervention strategy. Competition will be very important in ensuring lower prices and quality services. However the experience of basic broadband provision in many parts and especially rural Ireland illustrates that in many areas there is unlikely to be competition in services. This is probable also with the provision of a wholesale NGA network. Even in a duopoly situation competition in services can be limited, if it exists at all. Therefore, providers should be required to make available to all customers, a cheap basic package (which could be limited to a certain level of usage). In addition publicly available free high speed broadband/ Wi-Fi in designated areas would also be important. See response to Question 5.

Question 5, Section 5.5 What commitments or contracts can be practically entered into with operators so as to ensure they fulfill their own investment plans to deploy NGA services?

WDC: Operators should be required to provide as much evidence of commitment to invest as possible, details as outlined in the consultation document. Ultimately, however until the investment is actually undertaken, then it will not be certain. Question 9 below.

Question 6, Section 5.5 Do you agree that the type and range of information as set out in this section is sufficient to ensure the credibility of operator's future plans? Please provide proposals and supporting information to substantiate your answer.

WDC: The WDC would be of the view that the information outlined should convey the credibility of an operator's future plans. As will be appreciated the concern would be that the plans change (through as of yet unforeseen circumstances) and the deliverables could then change.

Question 7, Section 6.4. Has the Department included all existing and planned NGA coverage on the Map? Operators are asked to provide the Department (see contact details in Section 8) with sufficient information regarding existing or planned (i.e. within the next 3 years) NGA coverage if they have not already done so. Operators are also asked to indicate if they have plans which extend beyond this three year period and the expected completion date for such planned networks.

WDC: The WDC considers the map to be a fairly accurate reflection of all commercial and residential premises. The WDC cannot comment on the veracity of the operators' investment plans and has previously expressed reservations about the provision of basic broadband to the Department. The WDC notes the intention to update the map. It will be important to seek out information on new builds, especially smaller settlements and 'one-off' housing as these are ongoing (albeit at a lower rate than previously). Given the timescale for the Intervention strategy, it will be important to review and update all developments.

Question 8, Section 6.6, Do you agree that the strategic connection points listed above should be included in the NBP intervention? Please include the rationale for any change that you might suggest.

WDC: Yes, additional strategic connection points will be required to serve the general community interest in an economic and social context. Details below.

Question 9, Section 6.6 What type of strategic connection points additional to those listed above should be included in the NBP intervention? Please include as much information as possible about any new type of locations and the reasons why you believe they should be included in the NBP intervention.

WDC: Additional strategic connection points should be considered especially in more rural locations and particularly in the context of rural Garda office and rural school closures. All Council offices including local area offices as well as libraries and community centres (especially in rural areas) should be designated strategic connection points. Each village settlement should have a strategic connection point, most likely within the post office, or school. In the event that these sites are no longer or were never available, alternatives should be identified, such as the village hall or community centre. Other places where people congregate should be considered. For example, in the context of tourist areas (for example the Wild Atlantic Way) where tourists and industry providers require higher performance than the typical residential high speed broadband connection.

Ends

If there are any queries on this submission please contact Deirdre Frost, Policy Analyst, deirdrefrost@wdc.ie