

ICBAN Response to COMREG Draft Strategy Statement for Electronic Communications for the period 2017-2019

Thank you for the opportunity to respond to this consultation. We are a local authority led development organisation which works in the cross-border areas of Ireland and Northern Ireland, covering the Council areas of: Cavan, Donegal, Leitrim, Monaghan and Sligo, in what is known as the Central Border Region.

ICBAN has been tasked to support member Council interests in ensuring broadband telecommunications services best meet the needs of these local authority areas. This is an area which the group have been active in for the past number of years and have completed a study on the broadband infrastructure solutions for Northern Ireland. A comparator study is currently being completed for the County Council areas within the partnership.

In this context we make the following comments against the questions set out in the ComReg document 16/115:

Q.1 Do you agree that Chapter 3 captures the most important sectoral trends over the coming five years?

Rural-urban divide. The rural urban divide is understood. ICBAN would wish to suggest this matter can be helpfully be addressed by training additional resources to work on infrastructure delivery. The qualifications needed are not necessarily high level, as most of the work is civils based.

ICBAN, on behalf of the Border County Councils, would welcome the opportunity to discuss the resource issues and to outline related proposals that would help overcome these challenges at the earliest opportunity.

Convergence – The convergence of fixed and mobile services are not dealt with adequately. The document would benefit from greater clarity of Comreg priorities in this area and how the regulator intends to support the convergence of numbering systems. Comreg must demand transparency of the parameters supporting the underlying data transport infrastructure. This could include a Bi-annual publication on the state of Ireland's data transport infrastructure, with typical measurements including peak-hour bandwidth available to users. This would help users understand what mix of OTT services will work given the resources available.

The internet of things... We would welcome a more thorough proposal on how Comreg's spectrum allocation policy can support the widespread use of IoT based devices. We would welcome discussion on the enforcement and improvement to the coverage obligations that would apply in rural areas.

ICBAN believes some rural test beds are needed. There are several sites in the border area suitable for 5G test bed activity and we would welcome the opportunity to discuss these with Commreg.

Evolving networks. – We agree with the view that fibre networks will need to be pushed further. Given the ambitions of EIR's and SIRO etc., and the National Broadband Plan, Comreg should hold a consultation on a possible 'sunset' date for telephony. This would further assist the NGA business cases for EIR and SIRO.

The issue of resources for upgrading access networks has been made but it is relevant to reference this here also.

Evolving regulation.

Regulating oligopolies is a tough task. This is compounded by the legacies of Eir and ESB and their relationships to Government. There is a danger of over-stating the value of competition, when in fact the regulator can be consumed by refereeing two large companies with strong identities.

Comreg, to be effective and relevant in its role, must focus its objectives for the Irish market, rather than overly referencing the European Framework. How does Comreg assist directly in securing value for money for Irish taxpayers in the forthcoming national broadband delivery? What leadership role is Comreg taking in setting sunset dates for telephony? How does Comreg support convergence of fixed and mobile services in its spectrum policy? How will Comreg hold EIR and SIRO accountable for their broadband commitments? We believe that Comreg should spell these matters out in more detail.

The above are more important to the Irish consumer than adherence to high level but less tangible European directives.

Q.2 Do you think that we are capturing the nature of the challenges posed by sectoral trends accurately?

The switch to on-demand TV has not been dealt with adequately. Consumers may wish to consumer more on-demand TV services using their broadband connection, and thus divert some of their TV licence costs to paying for a better connection so they can consumer content in this way.

4G coverage obligations have not been discussed adequately. This is worthy of specific proposals from Comreg.

Q.3 Are there important sectoral trends that have not been identified in this document?

The commitments made by EIR and SIRO are significant for a country the size of Ireland. These commitments should be referenced specifically. Comreg should outline its role in both supporting this investment and how it will hold both companies to account

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Q.4 Do you agree with the Strategic Intentions outlined in Chapter 4, and discussed in detail in Chapters 5 to 9 of ComReg document 16/115 If not, please elaborate your reasoning.

These are a reasonable representation of Comreg's strategic intentions. ICBAN believes Comreg should reference some benchmarks for what 'good' typifies for each of these intentions. Quantify competition – 2 or 3 network providers etc.? Perhaps this could be improved by adding a section on benchmarks for quality of broadband and mobile services offered against the best in class worldwide. The document might benefit from describing some strategic outcomes, as well as intentions.

Q.5 Does the information provided in Chapters 5 to 9 accurately reflect the issues underlying the Strategic Intentions?

The information does not reflect the circumstances of both EIR and SIRO investments in broadband, while the state is simultaneously wishing to let contracts for rural upgrades. This dynamic, the challenges it may create for the Regulator, and what role the Regulator expects to play in securing the best outcome for Irish Customers, are worthy of special comment.

Some specifics need to be presented on comparing the prices paid by Irish customers with their counterparts across Europe. What balance is Comreg seeking? What impact does Comreg expect to have on quality versus prices? Oligopolies will tend to compete on certain strategic points but follow each other's price rises.

Comreg's ambition for mobile coverage is not dealt with sufficiently. More investment is needed to secure minimum signals strengths and quality of service for all users. The sale of spectrum without securing the usage of that spectrum, is at this stage out of date in policy terms. Coverage obligations are now more important than that which auction or licence fees yield.

Q.6 Do you think that any of the Strategic Intentions should be omitted? Do you think that another Strategic Intention should be included?

ICBAN believe the strategic intentions are adequate. However each intention should be directly associated with a table of measurable goals.

Q.7 Are the Goals associated with the Strategic Intentions appropriate, and relevant? Should any of the Goals be removed or additional Goals included?

ICBAN believes the goals should be: more clearly stated; measurable; and capable of reporting against regularly.

Q.8 Is there anything else that should be added to, or omitted from, this Strategy Statement?

Various benchmarks should be incorporated to help measure Ireland's connectivity levels against those areas we wish to be compared with.

References to the national infrastructure could be strengthened by the publication of a national infrastructure report comprising white papers from CTO's in fixed and mobile companies, along with comments from leading academics.

The significant investments and ambition in NGA by EIR and SIRO are not really dealt with or perhaps fully appreciated. This we think is worthy of a special section. These are transformational investments and should be presented as such. These will require an exceptional level of support from Comreg to help bring to a timely fruition.