

**Department for the Economy - Northern Ireland Superfast Rollout
Programme - To further extend coverage of Superfast Broadband across
Northern Ireland**

Consultation Response by Irish Central Border Area Network Ltd. (ICBAN)

Thank you for the opportunity to engage with the Department on extending the delivery of high speed internet access across Northern Ireland, through this Consultation. Irish Central Border Area Network Ltd. (ICBAN) has been charged by its three local authority members in Northern Ireland to help seek answers and solutions to the gaps in service left by an over reliance on a fibre to the cabinet solution (FTTC) deployed and subsidised in Northern Ireland. We are a local authority development organisation which works in the cross-border areas of Northern Ireland and Ireland. The three local authority member Councils from Northern Ireland are: Armagh City, Banbridge and Craigavon Borough Council; Fermanagh and Omagh District Council; and Mid-Ulster District Council, which are all located on the border with the Republic of Ireland.

ICBAN will not comment on the specific postcode questions as part of the consultation, accepting that local authorities, community stakeholders, private service providers and others would be more competently placed. In respect of the consultation we make the general comments below. These are made with reference to the implementation of the report completed by ICBAN in June 2016, and entitled 'Fibre at a Crossroads - Part I'. This report examines the infrastructure solutions behind driving fibre internet deeper into the 3 Council areas and in particular into rural communities. The delivery of these findings have and will continue to be promoted through engagements with the Department for Economy, OFCOM, BT NI, DCMS, BDUK, DG CNECT, political representatives and other key stakeholders

ICBAN welcomes the desire to work with and prioritise communities and look forward to helping contribute to the delivery of this process. Supporting customers through planning FTTP extensions off existing subsidised infrastructure are much needed developments.

We welcome the progress on clawback and look forward to a full allocation from the £292m capital deferral in BT's accounts and a future share for Northern Ireland of what will be significant capital contribution owed by BT to the BDUK process.

We welcome the wider application of FTTP in the SRP project and welcome news that approximately 12,000 of the 38,000 properties targeted will benefit from direct fibre access installations.

It is however disappointing that after now some £64m of state aid that over a 100,000 properties cannot receive a superfast service.

It is also disappointing that so many postcodes appear to be those beyond BT's commercially funded cabinets and that BT is now seeking subsidies for these areas. However, BT have made no visible commitment to delivering FTTP in Northern Ireland and how they might serve customers stranded too far from a cabinet.

We feel strongly that rural areas, rather than those originally identified as BT's commercial footprint, should take precedence in any new build process.

Furthermore, and based on information BT provided to the Welsh Public Accounts Committee on November 14th 2016, we regard that BT's Fibre on Demand should be available at every exchange where public funding has been available and that this is made available at affordable rates consistent with the state aid measure. If BT has publicly committed to this in Wales, we cannot understand why BT will not do this in Northern Ireland.

We would further urge DfE to bring pressure on BT NI to publish its capital investment for commercial areas and confirm and verify its matched funding for the £64m of public funding, estimated at approximately £40m.

Finally, as Ofcom UK is now forcing the legal separation of Openreach, so that more investment can be secured, we look forward to seeing what equivalent measures will be introduced in Northern Ireland. It is important that there are accountabilities for the investment needed to match the commercial and competitive upgrades being orchestrated south of the border.

Shane Campbell
Chief Executive
ICBAN

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