

From: [REDACTED]
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I, [REDACTED]: Make the following submission in relation to the International Communications Strategy.

This consultation seems to be geared in the direction of players in the telecommunications sector and it is a stretch of the term 'public consultation'. I would like to make a submission notwithstanding players-providers in the telecommunications market. I hope my comments can be considered alongside business stakeholders.

As Follows:

Question 1: "Is there sufficient capacity and diversity of routes available to meet current and future demand over the next 5 years (or over a longer timeframe if that information is available)?" Please provide current capacity of international links (in absolute terms and percentage of fibre cable used/free at present) and plans for future capacity over the next 5 years (or over a longer timeframe if available).

Answer: We always seem to be doing things over protracted periods of time in this country. The time is now to get things sorted with international communication infrastructure. The seismic movements of Brexit will not wait. Ireland's broadband is subject to overload and needs much greater capacity. This can only be done by insisting that companies have adequate space in their systems. We cannot go into the post-Brexit world with a second rate and rickety communications sector.

There needs to be a common communication policy in the EU, or (CCP) ; like CAP for farmers, which will be subsidized by the EU and will set up electronic protocols for all EU member states to use and will have a better connectivity with WTO countries. This is a worthwhile idea and of course would be very attractive to providers of communication service providers. Our government should purpose and pursue this objective with the EU commission, as an effective long-term solution to our connectivity needs.

Question 2: "What are the key challenges and commercial barriers that exist in the development of international connectivity in Ireland?"

Answer: They are two-fold. **1)** Ireland needs more providers in the telecoms market. The lack of competition in the telecoms markets has meant that a small number of providers can set prices or form cartels against the consumer and business interests. Our connectivity in the post-Brexit world will become a crucial matter. But not alone international connectivity, but domestic connectivity. Ireland's broadband speed in rural parts of the country is very poor and unworkable for many businesses. There is little point in better and more international telecommunication services, unless our indigenous broadband quality, reliability and affordability is excellent. It is anything but. How we link up with the UK in the post-Brexit world will also be key for our survival in the global market, now that we cannot rely on the UK for retail markets.

2) Electronic connectivity must be backed up with logistical capability. This means a much better postal service with faster delivery times. Our mail system across the Atlantic is no better now than it was in the 70's. We also need to beef up our dated customs serviced and employ more personnel to handle goods from WTO countries. Goods to and from the UK are taking many weeks, instead of days. Again, the position has not improved since the 70's. Only slight gains will be made in trade and services, even if we were the best connected in the world, if we do not have good postal and shipping logistics in place.

Question 3 : "What measures are required, including actions by the State, to alleviate the key challenges and commercial barriers in the development of international connectivity in Ireland?"

Answer: Telecom companies look long-term for sufficient customers for their large investments. Ireland's population is small and profits may not be what some companies want. Tax reliefs may be the only way to convince providers to invest in Ireland's connectivity.

Offshore licensing seems to be a big headache for companies regarding infrastructure generally. The planning system will be key to giving companies faster responses to proposals, not alone on communications, but many other utilities.

Question 4: "Given that the most recently deployed and planned submarine cables on transatlantic routes have landed on the west coast of Ireland, are there likely to be any issues with onward connectivity from the landing station to service provider hubs and data centres?"

Answer: Broadband has always had one Achilles heel — the further away from the exchange you are, the slower and lower quality it gets. There are technical solutions to these problems and they should be pursued with all speed. Consumer take up of broadband and extensions of the national broadband scheme should also be key government objectives. The West of Ireland poses many challenges — one of the biggest is getting enough customers and giving those customers a decent rate of speed and reliability, notwithstanding infrastructural issues/problems.

Question 5: "How do you think Ireland is positioned when compared to other countries with best practice international connectivity?"

Answer: Broadband services in this country are in their infancy and very poor quality in many parts, outside major satellite towns. Again, better international connectivity will make little difference if domestic broadband is not brought up to speed and quickly, now that Brexit is making an impact and an online way of communicating is taking hold across the globe.

Other countries have far more competition in their markets and consumer rights are to the fore. Because we have few providers in Ireland, we should strengthen regulation to make sure these providers do not hold this country to ransom.

Question 6 "How can Ireland position itself as the preferred location to land submarine fibre optic cables in Europe?"

Answer: By the government making it clear to providers that the state is completely committed to Ireland's connectivity and has a hands-on continuously active involved approach.

To have a vision that Ireland will be the center of communications over the Atlantic between the US continent and Europe and the center of the world for communications. We should be high minded in our approach and with the backing of the EU can achieve it. We must set out our goals to the EU in this regard.

Question 7: "How can Ireland make it attractive for companies to build new submarine fibre routes from other European countries to Ireland?"

Tax incentives will play a key role and a swifter planning system for infrastructure domestically in encouraging companies to invest in Ireland's international connectivity. However, consumer rights must feature prominently and the avoidance of monopolies and exclusive contracts which can be anti-consumer.

Additional comments: In the statement of strategy it is clear that "a wait and see policy" is taken with some approaches to things and how they are going to develop in the future. Ireland cannot afford to wait and see, the time is now to plan for the future and get Ireland fully connected.

In order to make it attractive to investors in the communications sector to invest in Ireland, consumer take-up for broadband must be good and confident. Consumers are swapping and changing providers quite often in this country because of sudden withdrawal of services or reduced quality. Communications must be cost effective for consumer and provider, reliable, and have sufficient speed and capacity.

Unilateral changes in consumer contracts for mobile phones and broadband services, which are frequent, must also be dealt with effectively by better regulation to protect consumers against sharp practices in the ICT sectors across the board. Consumer confidence will be fundamental in establishing long-term goals in the electronic communication sector. Without it — the game is up.

Email needs to be encouraged far more in this country. You will find it difficult to obtain an email address for many businesses in this country — although the situation has improved. There is a shyness here and also reluctance sometimes to reply to emails. In the U.S. Email is taken very seriously as a communicator. All businesses, by law, should be required to have an Eircode at the very least and a valid email address and telephone number. Full use of ICT must accompany any investment either domestically or internationally. Otherwise what is the point, when retarded ways are laying modern technology to waste from outmoded thinking and stubborn attitudes.

You have my permission to publish the submission in full.

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