

### 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)?"

### A 1.1

No there is not sufficient capacity for future demand as the increase in demand for WEB2.1 services has increased. The need to provide bandwidth for future expansion is not available on the existing submarine networks that we have connecting to Ireland. We need to expand the offering and dramatically increase the available bandwidth and capacity so that Ireland can become a connected Island.

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).

#### A 1.2

At present we are running at 80% capacity however this is seen at peak as there is no extra capacity for redundancy of services. New cable networks need to be provided to supply a fully utilised service with redundancy of services. We need to be at 50% capacity to meet current market needs and demands.

# Question 2

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

### A.2.1

The Irish Government has not been very positive towards the Telecommunications sector. As we can see on the international front, at a recent industry conference, the Scandinavian Countries are now building new submarine cable networks and attracting three to four times the capability that Ireland can and it's because the Scandinavian Countries are getting Government backing (not financial but legislation) to help bring the bulk of next generation green Data Centres to their shores. The large hyperscalers and industry leading Data Centres see the Scandinavian Countries and the UK as a better option compared to Ireland, because they are allowed to establish their services in these countries while the Irish State is building barriers: Apple Case in Tuam!

Data Centre development in Ireland needs to expand and the new idea that the Data Centre and the Submarine Cable Landing Station can perform the same service, helping to bring their customers closer to the communication edge.

### 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?"

### A 3.1

The Irish State should enact legislation that will allow for the future growth of next generation Data Centres which will use green energy and will need a capable submarine cable network for

connectivity. The Irish State needs to adopt the same attitude, practiced in Europe and across the world, that will defend its rollout of communication networks and planning laws against the lone wolf who can slow down projects or even stop them. It is these single-minded court actions from people who have self-interested concerns and disregard the greater good. These actions put the project and the possible prospect of new jobs at risk.

# **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?"

#### A 4.1

This is where we have a problem, the State has allowed for a single entity to stop the landing of submarine cables on the west and has contributed to the cost of the project, the State has provided ammunition to anybody and everybody to decide if they want to stop progress. The reality is, which is practiced across Europe, is the need to expand communication networks and promote competition that helps to increase bandwidth and capacity needs to be enacted by the Government. The need to land submarine cables and help with its onward connectivity to the existing telecom network and Data Centres needs to be protected by the State and Comreg and promote competition among the existing telecom operators. There needs to be a realistic approach where Telecom Providers are allowed build and use the Government owned MANs to connect the submarine cables into these Data Centres. At present the lack of optical connectivity from the coast will hinder development, slow down Irelands digital evolution and push back our ability to become the Digital Hub of Europe or "Europe's Digital Hub".

### **Question 5**

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

# A5.1

Since 2011 Ireland had opened the door to the idea of Neutral Submarine Cable Networks, this idea soon developed into new and future builds. However, the this has now proven to be a false start, it's not because the operators or the deployments of Neutral Submarine Cables have slowed down development, it is because the State is putting up barriers. Costs such as Foreshore licence costs and other costs associated with the deployments of submarine cables has made Ireland a very expensive place to land a cable. The Government departments responsible need to understand the reasons for connectivity. Community projects involving submarine cable deployments need to be treated as local developments and not large international connectivity projects.

At present, most submarine cables will now bypass Ireland and connect straight into the UK, France and most probably the Scandinavian Countries. It is because these countries have promoted themselves as the next big Data Centre and Submarine Cable connectivity hub. The State needs to understand that it needs to support its telecom providers and allow investment and infrastructure to be built without hindrance and also allow submarine cable connectivity to the Islands to be treated differently to large corporate international communication projects, with a lot of money.

### Question 6

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

# A 6.1

By promoting itself as the gateway to Europe or "Europe's Digital Hub" by using its assets such as the educated populace, the Engineering knowhow and the ability to get things done. By making sure that every and all submarine cable companies and providers are made welcome and given every opportunity to grow just like every other industry. They will also need to protect it from scrupulous people who will want to gain from creating issues that slow down or stop submarine cable or communication network builds. The communication industry and the submarine cable industry is even smaller and Ireland has already gotten a bad name in this arena.

Ireland and especially the State/Government need to look beyond the local vote and understand the national question. For Ireland to become Europe's Digital Hub it needs to look to the national good and develop its digital future.

### Question 7

"How can Ireland make it attractive for companies to build new submarine fibre routes from other European countries to Ireland.

# A.7.1

The only way Ireland can do this is to set up a forum where all the submarine cable operators and experts will have a voice and where they will be heard. The Government needs to understand that Ireland has a very strong tradition in submarine cable connectivity. We developed and innovated the idea of long-distance telegraph submarine cable connectivity with the 1866 telegraph cable. The ideas, innovations and developments made Ireland the submarine cable hub of the world with Valentia, Howth and Waterville being the centres of submarine cable connectivity and innovation.

The Government needs to understand that the telecom sector cannot survive without good submarine cable connectivity and this needs to get top cabinet attention. The inward investment by the Hyperscalers and others is being lost to the UK, France and the Scandinavian countries. This is due to these countries understanding that by being able to assist with the Hyperscalers, Data Centres and Submarine Cable network providers growth strategy. If the Government/State understood this, then the benefits will be huge with higher corporate tax returns, jobs growth and helping Ireland to become a centre of excellence for communication innovation and becoming Europe's Digital Hub.