

# International Connectivity for Telecommunications Public Consultation

October 2020



### Question 1

"Is there sufficient capacity and diversity of routes available to meet current and future demand over next 5 years."

#### Answer 1

There is sufficient capacity and diversity of routes connecting Ireland to the UK however, connectivity from Ireland to mainland Europe is lacking which would provide additional international diversity. It is also worth noting that the lifetime of cables connecting to Ireland is an important consideration when considering asset availability with timing of new investment generally cyclical.

# **Question 2**

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

#### Answer 2

Challenges in the development of internationality connectivity to Ireland include but are not limited to:

- High cost associated with building submarine cables
- Requirement for cable burial due to shallow water between Ireland to UK/Europe
- Distance on non-UK routes require repeatered cable with additional impact on cost and fibre quantity
- Permitting & cable approval process delays or changes can negatively impact business viability of new systems or delay inflight deliveries
- Risk associated with cable breaks and damages due to shipping/fisheries across busy channels

### **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 3**

Possible measures include:

- Clarity of permitting and cable approval process with clear milestones
- Efforts to support pre-approved landing routes onto the island with guaranteed timelines
- Efforts to support connectivity to continental Europe
- High density dark fibre, open-access, long haul networks nationally
- · Certainty regarding the Ireland-France power interconnector and associated fibre network
- Improved attractiveness of Ireland as a location for data centre development (which drives international connectivity demand)
- Policy certainty in forthcoming multi-regulatory environment (with its potentially diverging data privacy requirements between jurisdictions) will be important

# 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 4**

High density dark fibre, open-access, long haul networks nationally are important to enable diverse routes omnidirectionally across the island. Enabling such infrastructure-rich backbone networks with governmental support or policy could foster market driven backhaul networks between key hubs.

# **Question 5**

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

# **Answer 5**

Ireland compares reasonably on international connectivity, even with the obvious challenge of being an island, however could benefit from more international routes beyond the existing UK and (smaller number of) US routes today.

# **Question 6**

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

#### Answer 6

Investment decisions regarding choice of country to land major international or inter-continental systems are multifactorial and multi-year. It's important to ensure that Ireland positions itself as an extremely competitive location to land at any given time. (See more in Answer 3).

Developing Ireland's story as the shortest route from Europe to US and adding additional international routes to then transit to mainland Europe could potentially help position Ireland well as a key target for trans-Atlantic cables to Europe.

It's also important to restate that the attractiveness for DC investment in Ireland drives demand for connectivity to Ireland itself (in addition to the European transit story mentioned).

# **Question 7**

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

# **Answer 7**

Similarly to Answer 6, positioning Ireland as an excellent transit location towards the US with certainty of regulatory environment, well priced market offerings and low-latency-technically-attractive routes, with other differentiators versus other locations in Europe.