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alternative operators in the communications market

**Submission: Consultation on the Digital Connectivity Strategy -
Department of Environment, Climate and Communications**

Submission By ALTO

Date: March 31st 2022

ALTO is the association for Alternative Operators in the communications market. It is a non-profit industry group established in 1999 to represent the interests of new operators entering and operating in the communications market.

ALTO currently has 7 members. All of whom very well-known and are drawn from all sectors of the telecoms industry. Current ALTO's members are: (1) BT Ireland; (2) Sky; (3) Colt Telecom; (4) 3 Ireland; (5) ESB Telecoms; (6) Verizon; & (7) Vodafone.

ALTO represents its members with regulatory authorities and policy makers such as the Government, the EU, ComReg and the Competition and Consumer Protection Commission – CCPC, to ensure a competitive and fair business environment in which members can operate successfully. Members also benefit from effective monitoring of current and future legislative and regulatory developments both nationally and abroad, together with aligned advocacy.

ALTO operates strictly within the ambit of Article 101 of the Treaty for the Functioning of the European Union and the Competition Act 2002 (as amended).

Preliminary Remarks

ALTO welcomes the publication of the Department of the Environment, Climate and Communications (“DECC”) Digital Connectivity Strategy.

The market is at an important period in its evolution presently. Primarily as we move towards a more fibre enabled society and future, certain network elements, such as copper and digital lines, will become obsolete through switch-off programmes.

The industry is firmly focussed on the future and seeking the best possible solutions to enable Ireland's communications sector and making sure that both business and

consumer users are protected and can obtain world class communications services, regardless of where they live or are situated.

The Covid-19 pandemic has taught the industry and wider society many lessons. One such lesson for the communications market is that it is a critical facet in keeping the economy going when the worst events occur. That, and a noted movement of people away from densely populated urban centres to more rural locations. If broadband roll out was more like the electrification processes of years gone by, perhaps every premises in the country could quickly benefit from fixed fibre enablement. The industry, including Government and regulatory stakeholders must move with an outrageous sense of urgency to enable Ireland with fibre. We have a lot done, but there is a whole lot more to do.

Answers to Consultation Questions:

Q. 1. Is the ambition level set out in the State's Digital Connectivity Strategy appropriate?

A. 1. ALTO notes the position set out in the State's Digital Connectivity Strategy and agrees that the ambition level set out is broadly appropriate and should be achievable based on the publications available to the Department.

Q. 2. The Department invites commercial operators to submit details of their existing or future planned networks delivering broadband services to premises with at least 1Gbps download speed? Details should include the list of premises that are or will be covered and the expected date by which the Gigabit broadband service will be made available to each premises.

A. 2. ALTO is not in a position to address a meaningful answer to this question on its own. However, members of ALTO are likely to so do.

ALTO submits that in the coming two to three years, ALTO members are going to be heavily focussed on network rollout. One of the key enablers in that area is access to infrastructure. To that end, we note that the Copper Switch-off – CSO, and Physical Infrastructure Access – PIA, areas are of note particularly in the regulatory arena.

ALTO supports the accelerated roll out of the NBP and looks very favourably on new entrants such as SIRO and Virgin Media entering the wholesale market for broadband services.

Q. 3. Are the strategic enablers set out in the State’s Digital Connectivity Strategy appropriate? Do these strategic enablers need to be amended? Are further strategic enablers, initiatives or measures needed?

A. 3. ALTO agrees that the strategic enablers set out in the State’s Digital Connectivity Strategy are appropriate. The strategic enablers do not need to be amended. ALTO proposes that in the context of 4.5 Regulation – that the State should seek to monitor the activities of ComReg to ensure that the agency is fully functioning and has the resources to regulate the wholesale and retail sides of the market in a timely manner. One component of the State’s proposed strategy is the possible introduction of a Broadband USO. USO in Ireland on the fixed network has not been fit for purpose, with years and years of submissions being made for funding when the market had moved on generally. The Department should carefully assess any system it deploys related to USO, and investigate whether a voucher system would be more appropriate to ensure wider broadband coverage.

Q. 4. The Department welcomes any views on the State structures, agencies and resources needed to oversee and ultimately secure the delivery of the Digital Connectivity Strategy?

A. 4. ALTO submits that it is important that the strategy and its enablers are reviewed periodically, and it would make sense for a taskforce or forum to be established with representatives from key stage agencies as well as industry representatives to oversee progress within the strategy.

Q. 5. The Department welcomes any views on how to ensure a sufficiently skilled workforce, with the necessary competence and experience, is available to industry and the State so that Digital Connectivity Strategy can be delivered? The Department would welcome suggestions on the State's role in encouraging the development of this workforce?

A. 5. ALTO notes that the communications market is a market that is amenable to systems of training not dissimilar to apprenticeships. A programme of cross industry incentivised recruitment at apprentice or 'entry for skills' might be one suggestion to foster and develop a skilled workforce. This suggestion is difficult as many skilled workers are taken by OTT and platform providers seeking best in breed staff to ensure their networks are maintained. ALTO submits that if the Department was to find a way to incentivise companies to hire and train in such a manner, it could assist this strategic goal greatly. The State can and should play a role in this area, the challenge lies in how to properly incentivise organisations to hire, train and provide career diversity for employees to retain their skills in the communications market.

Q. 6 .The Department welcomes any other general observations and views on the State's Digital Connectivity Strategy and how it can be improved?

A. 6. ALTO submits that it is important to track the progress of the Digital Connectivity Strategy with the relevant stakeholders. It is not enough to simply suggest that the MPBBT will do that. The MPBBT plays a pivotal role in the market, but often does not analyse market failures or areas where regulation is not working. ALTO suggests that a high-level stakeholder forum be convened by the Department to engage in the process of strategic review.

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