

**From:** [REDACTED]  
**To:** [DigitalConnectivity](#)  
**Subject:** Enet Response to Consultation on Digital Strategy  
**Date:** Thursday 31 March 2022 15:40:53  
**Attachments:** [ENET\\_Response - Consultation on Digital Connectivity Strategy.docx](#)

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Hi Team

Please find attached Enet's response to this consultation

If you have any queries on our response or would like any additional information on data we would be happy to engage further with you on that.

Regards

[REDACTED]

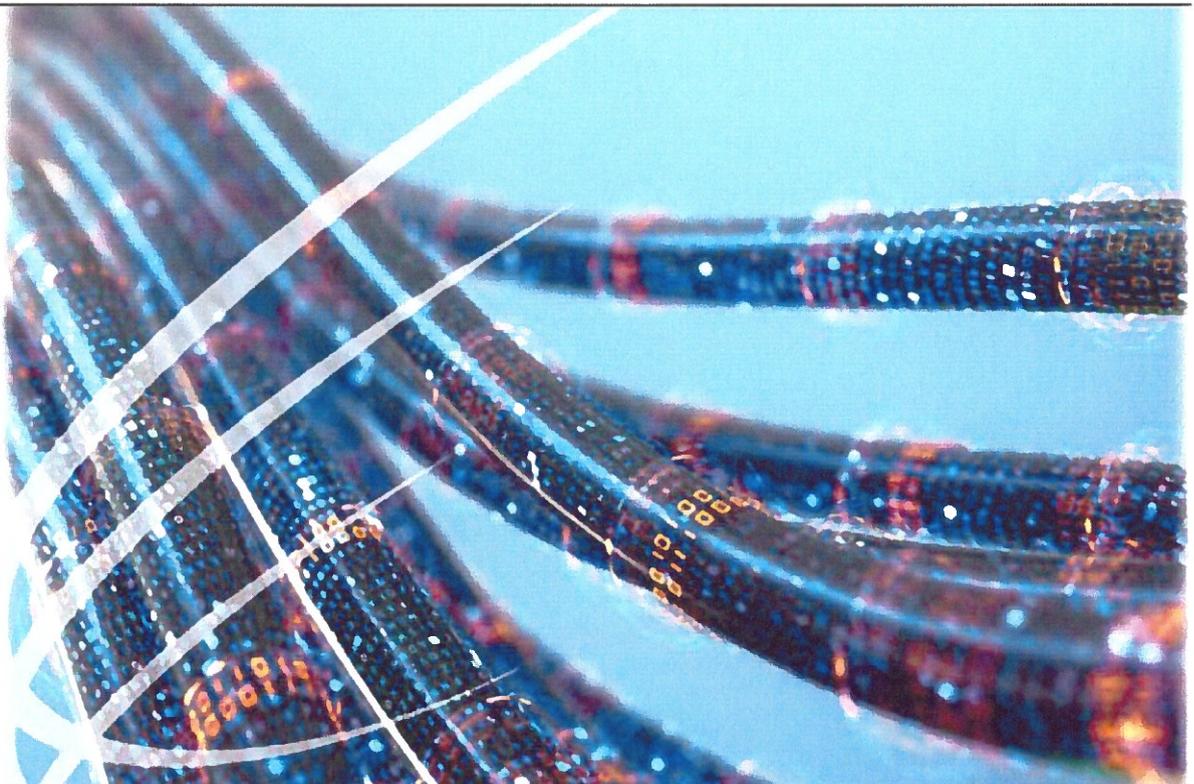


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# Response to the consultation on The Digital Connectivity Strategy for Ireland

## March 2022

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

We believe the ambition level of the strategy is broadly appropriate. It overall aims to align with the EU digital which if achieved will ensure that Ireland remains competitive with the greater single market area.

While the strategy at an overall level is appropriate, we consider that particularly at the level of enablers perhaps the Department could take a more ambitious view with regards to access of the current enablers that exist place and improving the availability of those to the commercial operators within the sector as well as accessing other start capabilities to provide new enablers. It will be when a really well functioning level or co-operation between the private sector and public bodies is achieved that the advancements required to meet the gaps that currently exist in meeting the targets of the strategy will be fulfilled.

## **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.**

See attached link to Enet current Network coverage footprint:

<https://www.enet.ie/coverage.html>

We can provide this information in other forms if required such as .kmz file etc

Addition to this we are currently building out new fibre networks with a view to completion in 2023 in the greater Dublin area to Swords and Greenogue with other areas currently under investigation for further future network build.

We are happy to share the exact routing of these new networks with the Department directly but as they are currently commercially sensitive, we will do so at your request if required.

### **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?**

This is one area where we feel that the strategy could include a more ambitious approach. There are state owned lands and infrastructure through out the country under the remit of an array of different agencies and companies, from local authorities to semi state companies. The level of access provided by these different entities can vary widely with some being very willing to allow the infrastructure to be used to enable the digital agenda and other less so inclined.

One useful step in further enablement would be to access all publicly owned assets and infrastructure with a view to ascertain the policies in place by each agency/party have in place on how access to the infrastructure over which they control is provided to ensure that 1 those policies are 1 appropriate in terms open access and neutral between commercial operators and 2 ambitious in how they help enable digital deployment.

#### **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?**

Our view is that the current structures are broadly appropriate where the Department act as the policy function which then guides the stakeholders and then COMREG as the regulator police to extent in general terms how the policy is implemented.

As mentioned in response to question 3 above. An overall assessment of all state-owned infrastructure and how it is used could be a useful intervention at this time. Which agency should carry out such would probably need some consideration as not all the assets and properties are controlled by parties whose day-to-day operation occurs in the telecom sector some cross departmental team or agency that can get an overarching view across all state and semi state actors would probably be best placed to carry out such and assessment. We are not suggesting that a new agency would need to be created for the purpose.

**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?**

Enet does not have particularly strong views on this topic. Except to point out that in general terms recruitment from outside the EU is becoming more common place with the sector and so any general reforms that would help increase the efficiency around the process of issuing of visa for new employees would be welcomed.

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

Our view is that strategy overall is broadly appropriate. Through the implementation of it over time the Department should probably consider how it can reduce the need for direct interventions and instead try where appropriate to enable further development by the commercial operators so as to try and reduce the overall cost to the state in achieving the same outcomes. By enabling the commercial operators to do more of the build work required by removing/reducing barriers that may exist today to state owned infrastructure (in doing so creating additional revenue streams for state agencies and companies)