



Consultation on the Digital Connectivity Strategy

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BUILDING A LIMITLESS IRELAND

1 Introduction

NBI believes that better broadband networks promote social progress, equality and sustainability. With equal access to local, national and global opportunity, every person, community and organisation in Ireland will be empowered to achieve more. Therefore, NBI welcomes the opportunity to comment on DECC's Digital Connectivity Strategy.

2 Responses to Consultation Questions

Consultation Question 1

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

In NBI's view, the level of ambition set out in the Strategy is appropriate.

It is appropriate to set out measurable targets that need to be achieved by the telecommunications sector (Fixed and Mobile Connectivity) from now until to 2030. While the Strategy meets the EU's Digital targets for 2030 described in the EU's Digital Decade, it is worth noting that the ambition that "All Irish households and businesses will be covered by a Gigabit network no later than 2028" exceeds the current European target by a full two years. In this respect, while there is understandable frustration among those who are still waiting to be connected to a high-speed broadband service, it is important to recognise that Ireland is a leader in rolling out Gigabit-capable infrastructure on a nationwide basis, with the NBP network deployment a core part of this.

Additionally, NBI believes that it is more than appropriate that the Strategy identifies the key enablers that are needed to meet the nominated targets, while acknowledging that these enablers are typically multifaceted, complex, challenging to deliver and involve many different stakeholders.

Moreover, it is correct to suggest that the Digital Connectivity Strategy will be dynamic and will evolve over time, so it will need to be updated. It may well be advisable to nominate specific checkpoints in this regard to ensure appropriate review and revision over time.

Consultation Question 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.

One of the biggest challenges facing rural Ireland is to bridge the digital divide with urban areas. To remedy this situation, the State, through its NBP contract with NBI, is ensuring the delivery of high-speed broadband to every household and business in the NBP Intervention Area (IA). This initiative by the State complements the plans by commercial operators to build Gigabit-capable networks over the coming years and it ensures that, by a combination of commercial and State investment, nationwide Gigabit coverage will be achieved ahead of the EU's 2030 target date.

Highly ambitious in its scale, the NBP is the largest ever telecommunications project ever undertaken by the Irish State. It aims to radically transform the country's broadband landscape through the delivery of quality, affordable high-speed broadband to all parts of Ireland where such services are not available commercially. NBI is designing, building and operating the new high-speed fibre broadband network for rural Ireland, with broadband services being provided to end-users in the IA by a wide variety of retail operators.

The physical scale of the project cannot be underestimated as it stretches across 96% of Ireland's land mass. The project will bring high-speed broadband network to over 1.1 million people (approx. 23% of Ireland's population), following completion of the network deployment.

In summary, NBI is delivering the following:

- The largest telecommunications project ever undertaken by the Irish State.
- A world-class, high-speed fibre broadband network.
- Approx. 146,000km of fibre, 1.5 million poles, 15,000km of underground duct to connect over 554,000 homes.
- A range of wholesale services for broadband providers in the residential and business markets.
- Services to all broadband retail providers from the largest to the smallest, on a non-discriminatory basis.

The Intervention Area

The genesis of the NBP was to ensure high-speed broadband connectivity would be available for premises that do not currently have access to such services from any commercial operator. Industry consultations were undertaken to determine commercial operators' fibre (and equivalent) footprints and their future deployment plans. This mapping exercise determined the size of the NBP Intervention Area

which has been identified by DECC and published in its High-Speed Broadband Map.¹ The map shows the areas in the State which are included in the NBP as well as areas targeted by commercial operators.

Since no operator can be prevented from building a fibre network in the IA, the number of premises that are required to be served within the IA is changeable, in so far as premises eligible for a connection are added and removed on a quarterly basis. This is done on a formal basis with DECC.

It is also worth noting that if additional premises are added through new builds in the IA, then NBI is obliged to incorporate them within its deployment plans and deliver a network connection to them. As evidence of this point, the number of premises within the IA has already grown by approximately 17,000 since the NBP Project Agreement was signed in 2019.

A Note On Speeds

The NBP network offers connectivity to a high-speed broadband service with a minimum download speed of 500Mbps, which is available to all premises within the IA. A 1Gbps service is also available and in 2022 we have also introduced a 2Gbps service. All of NBI's current services exceed the 150Mbps download speed that NBI was originally contracted to deliver.

As a wholesale operator, NBI does not sell retail services directly to consumers but instead makes the new network available to all Retail Service Providers (RSPs) operating in the Intervention Area. Some 50 RSPs have already signed up to sell retail services availing of wholesale products that NBI makes available on its network. This arrangement is expected to bring significant benefits directly to consumers and businesses where competition between RSPs ensures better quality, an increased range of products and competitive prices.

¹ <https://www.gov.ie/en/publication/5634d-national-broadband-plan-map/>

Consultation Question 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?

NBI notes the Key Strategic Enablers listed in the consultation and agrees that they should play an essential role in ensuring the timely implementation of the Digital Connectivity Strategy. NBI also takes the view that more specific, measurable actions should be developed and reviewed to ensure this strategy is implemented as efficiently and effectively as possible.

By way of example, a specific enabler that could be considered is the adoption of the Common Union Toolbox of best practices to reduce the cost of deploying very high-capacity networks. Please see our response to Consultation Question 4 in this regard also.

Whilst the Digital Connectivity Strategy is clearly focused on supply side issues, relating to the enablement of the physical telecommunications infrastructure and services that are delivering digital connectivity, it may well be advisable to consider demand side initiatives as well. These activities help raise awareness about the importance of high-speed connectivity and the ways in which digitally enabled households can avail to a far greater degree of access services provided online. Demand stimulation measures can help to promote the adoption by citizens of online services and, as this happens, greater demand may, in itself, act as an enabler, thus creating a virtuous circle.

While demand side initiatives vary from country to country, it could be worth considering the ones that the State can play an active role in delivering. Potentially these could be investigated through the Mobile Phone and Broadband Taskforce (MPBBT). In this regard, our initial thoughts on the matter include:

- The possible expansion of the Telephone Support Allowance to include broadband provision. As we understand it, a weekly Social Protection payment of €2.50 is made for people who live alone and are already in receipt of certain other supports. This allowance currently assists in meeting the cost of communications and or home security solutions. An expansion of this allowance could remove a barrier and allow access to high-speed broadband for citizens who otherwise might not avail of such services.
- The development of digital literacy courses and upskilling opportunities to give all citizens, regardless of age or employment status, a prospect of reasonably engaging with digital services.

- The introduction of a computer / laptop / tablet 'scrappage' scheme to replace old and obsolete devices to enable beneficiaries gain access to appropriate hardware, which would assist them in engaging with digital services. A version of this could see a voucher scheme come into place for qualifying citizens, which would help to target the support where it is most required.

Consultation Question 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?

NBI notes the various structures and agencies who act as significant stakeholders in the delivery of the Digital Connectivity Strategy – for example, DECC itself, the Mobile Phone and Broadband Taskforce, ComReg, Local Authorities and others.

Since the Digital Connectivity Strategy is focused on the enablement of deploying physical telecommunications infrastructure it is only right to consider the vital role of the various planning authorities and agencies. If we are to reap the rewards of advances in technology and connectivity, joined-up thinking will be needed to ensure there is proper planning on a local, city-wide and national scale. In this regard, the initiative by Dublin City Council to establish a specific Telecoms Office is to be welcomed. This is a move that should be replicated by other Local Authorities, with appropriate funding provided to them to enable this to happen.

As we understand it, many, but not all, Local Authorities include a condition in planning permissions that requires developers of both commercial and residential properties to install carrier-neutral / open-access ducting for fibre optic cables. Not only does this ensure occupiers have access to all current services available, but it future-proofs premises for potential technological developments rapidly coming down the line.

The COVID-19 pandemic crisis highlighted the need for very high-capacity connectivity, and more importantly, the need for continued wide-scale investments in digital connectivity infrastructure. To incentivise these investments, the European Commission adopted the Connectivity Recommendation (September 2020), in the context of which Member States agreed, in March 2021, on a Common Union Toolbox of best practices to reduce the cost of deploying very high-capacity networks.

It is now the responsibility of Member States to progress the implementation of Connectivity Toolbox measures within their own jurisdictions. These measures, which should be aimed at reducing or eliminating administrative hurdles that prevent or delay the deployment of fixed and mobile high-speed broadband infrastructure, need to be promoted and championed within Government by DECC. The

successful implementation of these measures could be a key enabler in completing the deployment of Gigabit-capable networks and so will help to secure the delivery of the Digital Connectivity Strategy.

Similarly, EY's recent report for the Department of Public Expenditure & Reform (DEPR) identified a need for immediate action in this area where large scale infrastructure projects are underway.² The report notes that without mature processes being in place, there will be inconsistent outcomes across programmes.

Consultation Question 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 recent report by Google and Amárach, published in April 2022, suggests that investment in digital skills has the capacity to contribute an extra €9.5 billion to Ireland's GDP over the next three years. The research also highlighted that a majority of Irish SMEs are 'less than halfway' on their digital journey, suggesting significant headroom for further development.³

It is reasonably safe to assume that, given the rate of technological advances, the students of today will use technologies in ways that we cannot currently even imagine. Therefore, it follows that careers of the future will involve technologies that have yet to be developed, which in turn means that identifying and developing skills in this area is challenging. That being said, general competencies would include flexibility, openness to new technologies, and a desire for lifelong learning / digital skills development.

² Supporting Excellence: Capital Project and Programme Delivery Capability Review, EY Report for DPER, January 2021, available at: <https://assets.gov.ie/125020/d6d00ea5-7042-43bb-9fc9-c7ab736aec33.pdf>

³ https://services.google.com/fh/files/misc/sme_google_amarach_research_april_2022.pdf

Furthermore, given that access to data is no longer the issue, thought should be given in developing a curriculum that moves away from rote learning and repetition of facts and instead allows students (workers of the future) to:

- Research and analyse data,
- Report and communicate data,
- Collaborate with others across digital platforms.

In addition, teaching efforts should be pointed towards tools around internet safety / security, as well as legal and privacy aspects of online activities, including the appropriate usage of and participation in social media platforms.

A more immediate requirement in relation to ensuring an appropriately skilled workforce is the need to develop apprenticeships to deal with the growing skills shortage in the area of fixed and mobile network deployment. Skilled technical engineering personnel are in very short supply for fibre network deployment projects and with multi-year network deployment programmes underway, an appropriately formulated apprenticeship programme could go some way towards meeting the looming skills gap.

Skilled workers from abroad are also likely to form part of the required mix in this respect and so the State needs to ensure that work visas are available to appropriately skilled workers from outside the EU to enable them to take up positions in this country for projects relating to high-speed broadband network deployment.

Consultation Question 6

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

NBI has no other comments or observations to offer on the Strategy at this time.