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[A Consultation on the State's Digital Connectivity Strategy - SIRO.docx](#)

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Hi [REDACTED]

Please find attached Siro's response to the Consultation on the Digital Connectivity Strategy.

Many thanks for the opportunity to participate.

Best regards,

[REDACTED]



[REDACTED]  
[REDACTED] | [REDACTED]  
W: [SIRO.ie](http://SIRO.ie)



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31<sup>st</sup> March 2022

**Re: A Consultation on the State's Digital Connectivity Strategy - SIRO**

Dear [REDACTED],

Thank you for this opportunity to participate in the Department of the Environment, Climate and Communications consultation on the State's Digital Connectivity Strategy.

**Consultation Question 1**

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

We welcome the publication of this draft strategy. Ensuring that the State has an ambitious vision for digital connectivity in Ireland is essential for ensuring that the combined resources of the State and industry are working in tandem to deliver on that vision in a strategic and collaborative way.

There is a lot of work that has been done over the last years which has brought us to a position where there is now a clear prospect of digital connectivity in Ireland being addressed for the long term.

However, in building on this foundation of work done, it is important that we do not rest on our laurels and instead outline a vision and a strategy that is at once comprehensive, energising, ambitious but also a challenge.

In light of this we would call out two key themes running through the document that should be re-evaluated:

1. **Timelines:** These should be accelerated, and the enabling measures outlined should be retargeted to facilitate that acceleration. This is essential not only on the supply side but also on the demand side. As an example, the State should outline a target, that by 2024, all State agency and public office locations must only be connected using Very High Capacity Networks.

2. **Gigabit:** It is insufficient to target Gigabit connectivity, instead this should be both multi-gigabit and symmetric. All current builders of FTTP network are either deploying, and/or migrating/switching to XGS-PON. The era of asymmetric technology delivering distance attenuated broadband is over and this should be recognised, and the benefit exposed to consumers, businesses and the public sector alike.

#### **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.

SIRO is happy to provide this information.

#### **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?

From a high-level perspective, the detail of those enablers might be extended to include:

#### **Commercial Investment in Digital Connectivity**

SIRO believes that the targets set down in this section should be more detailed and provide for phasing and incremental goals. Moreover, it is important that qualitative aspects should be included in the goals. We would suggest modifying the targets in the following way:

1. All Irish households and business will be covered by at least one multi-gigabit network by 2028, with 77% of premises being covered by at least two multi-gigabit networks by 2028.
2. All populated areas covered by 5G networks, delivering a minimum available speed of 500Mbps download and 100Mbps upload at peak time, by no later than 2030, with 75% of populated area similarly covered by 2025. The requirement for the roll-out of 5G in the strategy is not currently qualified by a quality-of-service requirement, and it should be, otherwise, 5G can be enabled on infrastructure with a sliver of spectrum allocated, and the service delivery to customers being underpinned by legacy 4G connectivity.
3. Complete the delivery of symmetric gigabit connectivity to all connected hubs and all schools by 2023. The State should require a minimum of a symmetric gigabit in its procurement for state agencies/bodies by 2023, and in the meantime should require it as an option to be compulsorily tendered for in any State tender for broadband in advance.

#### **Regulation**

The introduction of a Universal Service Fund for broadband for both service availability and service affordability funded by the exchequer, and available to be drawn on by all those network operators rolling out symmetric gigabit connectivity should be an explicit aim of the connectivity strategy and a working group within the Mobile Phone and Broadband Taskforce might be established to plan for this.

### Unlicensed Spectrum

Comreg should be tasked with a program to ensure the quick availability of license-free spectrum as new bands emerge, including:

1. RLAN spectrum to support services such as WiFi 6e.
2. Unlicensed 5G spectrum for enterprise and home use.

Unlicensed spectrum plays a particularly important role in maximising the benefits of the investment in VHCN by providing that last 10 meters of connectivity, in the most powerful way, to the devices of the users.

### Licensed Spectrum

Comreg should be tasked with a program to ensure that licensed spectrum used for point to point and point to multipoint is more robustly policed to ensure it is being used in the most efficient manner using best available technology, and that it is priced fully to encourage it to be used in the most efficient manner as is possible. Innovative spectrum surcharges or license fee overages should automatically be levied to discourage hoarding and inefficient use. Spectrum that is being used with older modulations and less efficient radios should be actively discouraged and migration to more secure VHCNs encouraged, especially in the context of mobile and FWA backhaul.

### Broadband Cost Reduction Directive

The State should ensure the long stalled transposition and implementation of Article 8 of the Directive, requiring all planning permissions to contain a requirement to ensure broadband infrastructure to an adequate standard, is implemented.

### **Smart Cities / Towns**

SIRO has launched its 2Gbps Kilkenny Fiber network which is enabling the shift to smarter cities as an exemplar of its migration to multi-gigabit networking. The State should consider a more formalised program of Smart City initiatives to aid and encourage such pilot projects.

### **Research and Innovation**

The State should implement a program to encourage secure use of BGP multi-homing, and diverse physical paths, to maximise cyber security for business. This program should include grants for enterprise connectivity options.

The State should consider a program, or investigation, to mandate that all retail internet service providers switch to, or offer in parallel, IP v6 by the end of 2024 and plan to mitigate against the increasing scarcity of IP v4 addressing.

### **Consultation Question 4**

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

The State should consider supporting the local authorities further with additional resources, beyond just the Broadband Officer. Especially in areas connected to infrastructure roll out, further joined up management across local authorities, leaning on the example of the successful Traffic Management Offices, would be beneficial.

The initiative of Dublin City Council in establishing its Telecom Office is a model that should be replicated.

Local Authorities should be funded and directed to copy this model.

Ideally these offices would be integrated in a manner like the road management office to provide for a single point of contact for network operators.

Despite the good work of JULA, the Purple Book is not being adhered to universally and a greater focus on compliance needs to be applied in a common way across the Local Authorities to ensure better collaboration and an increased emphasis on cost orientation of the charges to ensure that there is no over recovery on the part of the local authorities (i.e. Betterment).

Comreg, or another body, such as the one described above, should be fully established and resourced to provide an EU best practice implementation of the Single Information Point provided for in the Broadband Cost Reduction Directive. Comreg recently outlined that they did not have sufficient information gathering powers regarding non-ECS/ECN owners of network infrastructure. This gap needs to be addressed as part of the implementation of the EECC transposition.

The Department should look to establish and embed a regular funding mechanism for pilot projects looking to leverage the opportunities of Very High-Capacity Networks. This may include establishing further industry linked applied projects in collaboration with the SFI Centre for Research Training in Advanced Networks for Sustainable Societies, or a regular cadence of Competitive Start Funding programs with Enterprise Ireland targeted at start-ups with businesses requiring Very High-Capacity Networks to provide their services.

The Department should request and fund the National Competitiveness and Productivity Counsel to monitor and report annually on the state of digital connectivity and its impact on business in the State compared to other competitor countries, reviewing in the context of the implementation of the Digital Connectivity Strategy.

**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?

SIRO believes that there is a ladder of investment in training, and training levels, that is necessary to ensure that the Digital Connectivity Strategy can be delivered and the latent benefits arising therefrom best captured.

1. Secondary School – Safe Internet Use and a Transition Year Cyber Security Module

2. Apprenticeships – The State should work with industry to grow and develop the apprenticeship mechanism, including <https://www.apprenticeship.ie/career-seekers/get-started/learn-more/ict/telecommunications-data-network-engineering-technician-l6> . Any state funded infrastructure project, especially touching on the telecommunications sector, should have an obligation to have an apprentice programme.
3. Graduate Placements – Degree programs such as <https://www.tudublin.ie/study/undergraduate/courses/networking-technologies-tu716/> could be encouraged to include an emphasis, or a major, in telecommunications, and include year long placements, with companies such as SIRO as part of the degree.
4. Management Level - Skillnet & Springboard+: Cyber / Network Engineering. There should be a focus on making available such part-time programs available across the country and in more traditional universities such as UCD/UCC/TCD
5. IMI / Smurfit Level - Leadership Level Training – SIRO believes that Leadership level training is necessary, even if only e.g. part-time for 12 weeks, to build sufficient understanding amongst business leaders as to Cyber / Network Security

All of these need to be supported by an ongoing and extensive Public Information Campaigns targeted at business.

#### **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?

The Department itself needs more resourcing.

There has been a delay with the transposition of measure such as the EECC and elements of the existing BCRD and there is a plethora of necessary initiatives to maintain the pace of Ireland's transition to a fully digitally connected society.

At a European level, a further update to the BCRD is being consulted on, and the Network and Information Systems (NIS) Directive (NIS2) is pending and both should be a priority of the State to support through the European Council and to encourage that the fullest and most comprehensive set of measures should be included in their progression and transposition.

The Department needs to be transposing these measures as soon as they complete their legislative journey in Europe, and ideally the Department should have the resources to be working on such transpositions in parallel to the legislative process, and if necessary to act in anticipation.

#### **Business awareness and information campaigns:**

Whilst there is significant emphasis on digitisation of society and business, with a strong emphasis on Cloud, AI and VR in the years ahead, many businesses continue to rely on outdated copper connections, which are not fit for such purpose. All State agencies with a focus on business and enterprise growth need to raise awareness and understanding of benefits of moving to Gigabit and fibre connectivity. This is a prerequisite to longer term digital maturity for businesses in Ireland.

We appreciate your consideration of our observations, and should we be able to answer any further questions or clarifications, please do not hesitate to reach out to us.

Kind regards,

No signature as sent by email

  
Regulatory Affairs Manager