

From: [REDACTED] (Regulatory & Policy Manager)
To: [DigitalConnectivity](#)
Subject: Consultation on the Digital Connectivity Strategy - Sky Ireland
Date: Thursday 31 March 2022 11:07:57
Attachments: [image001.png](#)
[Sky Ireland - Digital Connectivity Strategy consultation .pdf](#)

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[REDACTED]
Please find attached a short response to the Digital Connectivity strategy consultation from Sky Ireland. I would appreciate if you could acknowledge receipt of same.

Kind regards,

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Public Consultation on the Digital Connectivity Strategy

31 March 2022

Sky Ireland welcomes the opportunity to comment on the Government's proposed Digital Connectivity Strategy. Sky Ireland provides broadband to customers all over Ireland and in 2023 Sky will enter the Irish mobile market.

It is of critical importance that Ireland has a coherent and ambitious strategy to ensure Ireland can reach its overall target of enabling all Irish households and businesses access a Gigabit network no later than 2028.

Sky Ireland welcomes the overall targets set out within the strategy and the further detail outlined by the enablers to reach these targets. We have set out below comments on certain aspects of the enablers.

Q1. Is the ambition level set out in the State's Digital Connectivity Strategy appropriate?

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.

Sky Ireland welcomes the overall targets set out within the strategy and believes the ambition level within the strategy is appropriate.

Q2. 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?

Introduction of a Universal Service Obligation for broadband

With regard to the potential introduction of a universal service obligation for broadband, with the significant investment by the Government in the National Broadband Plan along with investment by commercial operators, the Government should assess the need for a USO in broadband. As the Government aim within their own strategy is for coverage to be ubiquitous, there may not be a need for a USO. If the USO is tied to the aim within the National Digital Strategy to provide ubiquitous digital infrastructure and to leave no at-risk groups behind, then addressing affordability of broadband via a government funded voucher scheme could be an alternative and more practical solution.

The National Broadband Plan

Sky Ireland welcomes the continued delivery of the National Broadband Plan, it is important that the strategic enablers help to accelerate the rollout of the NBP, particularly in the wake of the significant delays during the Covid period.

Regulation

As the strategy correctly highlights, 'ensuring best in class regulation and providing regulatory certainty is critically important to encourage investment and promote competition'. It is important

that as the telecommunications industry continues to develop, that the regulatory framework keeps pace and ensures that all stakeholders have regulatory certainty and transparency.

CSO – Copper Switch-Off

The strategy notes the importance of safeguarding consumers when it comes to the Copper Switch Off process and the challenges that may arise from it. Sky Ireland strongly supports this statement and highlights that while the overall aims of the CSO process are laudable, it is crucial that the process is undertaken in a fair and transparent manner, in order to deliver positive outcomes for operators and, most importantly, end-users (consumers). The strategy correctly notes that close collaboration between industry and state will be necessary and on this point Sky Ireland recommends that a forum chaired by ComReg to map out the CSO process is established at the outset.

This also ties into the wider aim of the overall digital strategy that references the importance of delivering 'social dividends' via digital infrastructure and that at risk groups are not left behind during the digital transition. Ensuring vulnerable end-users are not negatively impacted by the CSO (e.g where they have home or medical alarms that are connected via their existing copper lines) will therefore be of critical importance.

Q3. 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?

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 the progress of the strategy.

-ENDS -