

Telecommunications Industry Ireland

response to the public consultation on

Digital Connectivity Strategy

8 April 2022

Introduction

Telecommunications Industry Ireland (TII), the Ibec representative group for the sector, welcomes the publication by Government of the Digital Connectivity Strategy for Ireland and the opportunity to respond through the associated public consultation. The telecommunications industry supports the State's ambition to be at the forefront of European and global digital developments as set out in the Strategy as well as the Strategy's guiding principles.

An overarching objective of the Strategy should be to ensure that the State maintains a policy and regulatory environment that promotes continued investment in telecommunications networks, infrastructure competition, and innovation in emerging technologies, and supports both environmental sustainability and social cohesion. The Strategy must also ensure regulatory certainty for investors and promote fair competition for all stakeholders. This is vital because of the essential role state of the art telecommunications plays both for the economy and society.

Telecommunications is the backbone of Ireland's digital economy and underpins it. In 2020 the O.E.C.D. recognised Ireland as one of several "global hubs of digitally delivered services". Some 240,000 are employed in digital intensive sectors, up 17% since 2016, and an estimated 30% of data held in the European Union (E.U.) is held in Ireland. The telecommunications sector itself employs approximately 25,000 people and is estimated to contribute c.€2.5 billion to the economy annually.

Given the ever-changing nature of telecommunications technology, TII urges a regular review of the Strategy every three years and recommends that it is subsequently updated accordingly. TII suggests the establishment by the Department of Environment, Climate and Communications of a dedicated expert working group, including industry representatives in the area of electronic communications to assist in identifying and agreeing on best practice and in the implementation and updating of the Digital Connectivity Strategy.

In addition, the Department should request and fund the National Competitiveness and Productivity Council to monitor and report annually on digital connectivity and its impact on the business sector compared to other competitor countries. This review should take account of the context of the implementation of the Digital Connectivity Strategy.

General Observations on Digital Connectivity Strategy

Digital Connectivity Strategy Targets

The telecommunications industry believes that it is already well on its way to reaching the Digital Connectivity Strategy's overall national targets for fixed and mobile connectivity from now until 2030 which align to the E.U.'s digital targets for 2030 as set out in the E.U.'s Digital Decade. In fact, Ireland is on track to reach the E.U. Gigabit connectivity target by 2028, two

years ahead of schedule. This is due to the significant commercial investment previously made and currently planned by industry as well as that committed to by the State under the National Broadband Plan. Over the five years 2015 to 2019, over €3 billion was invested by the telecommunications industry in new and upgraded networks. This investment proved critical when Ireland was hit by the Covid-19 pandemic in early 2020 because it enabled working and studying from home. The industry has also planned increased levels of investment over the next few years to continue to deliver Very High-Capacity Networks (V.H.C.N.s) and 5G networks and also to enhance existing networks. This forthcoming investment complements the major Exchequer investment committed to through the National Broadband Plan initiative. Notwithstanding this, TII members wish to highlight several significant administrative, planning, and regulatory barriers which could negatively impact on Ireland achieving the Strategy's targets in the timeframe required. It is therefore critical that all of the strategic enablers outlined in the Strategy are progressed immediately.

Fixed and Mobile Connectivity

Ireland must ensure that it can avail of the economic and societal opportunities afforded by both V.H.C.N.s and 5G networks.

The benefits of V.H.C.N.s have been comprehensively analysed in the *NBP Benefits Report*¹ by PwC for the then Department of Communications, Climate Action and Energy. It is not proposed to repeat this report's conclusions as they informed the Government's decision to implement the National Broadband Plan. V.H.C.N.s are critical to Ireland's future cultural, economic and social development and it is important that official policies continue to support investment decisions currently being taken by many TII members.

To support the deployment of V.H.C.N.s, TII recommends improved planning processes and the introduction of relevant legislation to facilitate open access to housing developments, business parks and multi-person dwelling units for the installation of fibre. It urges that legislation be introduced to ensure that all new buildings are broadband enabled, including mandating that ducting is in place to facilitate connection to V.H.C.N.s.

The issue of access to multi-dwelling units for the purpose of installing end-user broadband connections should be examined. Some operators have encountered problems gaining such access and it is worth noting that this issue was identified by the authorities in the U.K. as a factor inhibiting timely high-speed broadband provision in urban areas. As a result, the U.K. passed legislation to resolve this problem during 2021. TII proposes that this issue is addressed through the Mobile Phone and Broadband Taskforce.

In the context of obstacles to network construction, TII would also like to take this opportunity to raise the issue of the facilitation of very high capacity connections at customer premises. It may be beneficial to consider how to incentivise the take-up of V.H.C.N.s where the customer is faced with remediation costs to allow for such a connection.

¹ <https://s3-eu-west-1.amazonaws.com/govieassets/8527/a8f88041f1f44255b0716f38e17b9448.pdf>

It is also very important for future competitiveness that Ireland is able to compete for the estimated €12 trillion of global economic output enabled by 5G in the period to 2035. A shortfall in investment in Ireland's 5G network over the rest of the current decade could see an estimated loss of the order of €12.6 billion in G.D.P. by 2030 according to research by Amárach Research². Countries that want to stay competitive in the global economy are adopting 5G technology at an increasingly rapid pace. Amárach Research concluded that a delay in the deployment of 5G would lead to a slowdown in technological innovation and a reduction in economic growth in Ireland. Using O.E.C.D. predictions of Ireland's long-term economic growth between 2020 and 2035, Amárach Research estimated the opportunity cost of low 5G adoption in Ireland would be a loss in G.D.P. of €6.1 billion by 2025, €12.6 billion by 2030 and €20.9 billion by 2035. Given the economic challenge that lies ahead for Ireland over the rest of the decade, it is clearer than ever that investing in a world class 5G network will play an even more vital part in our future than anticipated when Amárach Research published their report in late 2021.

In addition to the economic benefits of 5G enabled technologies such as digital manufacturing there is also the potential for very significant societal benefits when new applications currently under development come to fruition. For example, remote diagnostics and monitoring enabled by 5G can potentially improve patient care enormously and reduce the burden of travel for patients and their families. In another example virtual classrooms enabled by 5G can potentially transform distance learning fundamentally.

In order to fully unlock the true potential of 5G, TII strongly believes that Government and the public service should take a leadership role, firstly by embracing 5G, and by leading by example by utilising 5G technologies where appropriate, and secondly by running a public information campaign to communicate the benefits of 5G technology.

TII believes that the significant investment in 5G and the major transformative benefits it offers could be negated by the enormous and sophisticated deluge of online disinformation that 5G is harmful to human health, a claim contrary to all reputable scientific opinion. This disinformation is so sophisticated that it may well originate from a state actor. It has caused a significant level of objection to the deployment of 5G due to the public concern it has generated. The public are entitled to be proactively informed by the State of the scientific facts regarding 5G and human health in way that is both accessible and independent. TII recommends that the Government leads a communications campaign to counter the disinformation. Such a campaign can be funded by a miniscule proportion of the enormous sums the Exchequer will receive from industry in 5G spectrum fees and will complement industry's ongoing efforts to inform the public about 5G.

² *The 5G Future SME* (October 2020) - completed by Amárach Research on behalf of Huawei Ireland

Universal Service Obligation Proposal

TII notes that the Strategy contains a proposal for the “introduction of a Universal Service Obligation (U.S.O.) for broadband, where appropriate, to ensure and safeguard those services are made available to all”.

Careful and considered investigation and consultation should be conducted prior to bringing forward a U.S.O. measure. If such a measure is deemed essential, it should not be activated until alternative simpler solutions have been fully explored by means of a Regulatory Impact Assessment. TII requests that any proposed introduction of a U.S.O. measure for broadband would be guided by a public consultation where industry stakeholders are given a reasonable opportunity to respond and actively engage in the process.

The principle industry would support is that the State’s objective should be to ensure universal access to broadband and that it will work with industry to ensure that the best connectivity is provided to customers irrespective of location. There should also be safeguards to ensure the need for intervention is in exceptional circumstances only. A simple State funding model/voucher scheme could be established to ensure universal access where gaps may exist. TII members request an opportunity to engage in detail on this issue with Department of Environment, Climate and Communications before any decision is made.

Recital 213 of The European Electronic Communications Code [Directive (EU) 2018/1972] recognises that broadband availability is in fact not really the issue stating *“Basic broadband internet access is virtually universally accessible across the Union and very widely used for a broad range of activities. However, the overall take-up rate is lower than availability as there are still those who are disconnected due to reasons related to awareness, cost, skills and due to choice. Affordable adequate broadband internet access has become of crucial importance to society and the wider economy. It provides the basis for participation in the digital economy and society through essential online internet services.”*

This analysis by the European Union suggests that it is more important to address other factors such as basic digital skills and affordability. In terms of addressing affordability issues, TII members propose that an Exchequer funded voucher scheme for customers should be explored and developed as this would prove a more appropriate solution. Other inhibitors can be best be addressed through the Mobile Phone and Broadband Taskforce or other targeted measures. For instance, the deficit of basic digital skills should be addressed through expanded digital training which is more proactively marketed to the relevant segments of the public.

Sustainability

TII notes the proposed analysis of the positive and negative impacts of digital technological changes on sustainability, in particular energy efficiency and the circular economy, in consultation with experts. TII would welcome participation in this process and recommends a government led committee with industry representation to collaborate on this analysis. Several TII member companies have commissioned their own research in this area and are willing to share their findings with Department of Environment, Climate and Communications.

Observations on Strategic Enablers

Commercial Investment in Digital Connectivity

Individual TII member companies will respond directly to Department of Environment, Climate and Communications on the detail of their investment plans.

Investments in digital connectivity, be it broadband or 5G services or in general network improvement, will create jobs and deliver state of the art networks that will fuel long-term economic growth and provide significant wider societal benefits. While commercial investment is crucial for the delivery of this essential connectivity, there is an urgent need for a framework of policy measures to support an investment environment for the deployment of critical digital and telecommunications infrastructure, through public-private mechanisms or otherwise, which will enable balanced regional development, employment, and growth.

A significant gap remains in providing mobile voice and data services to address coverage “blackspots”, which continue to have a negative impact on business, tourism and communities in the affected rural areas. Over the last number of years, TII has engaged with senior officials and policymakers in several government departments and State agencies to explore the opportunity for State and industry collaboration, or a “shared rural network” initiative to address this issue thereby further supporting balanced regional economic development and social cohesion.

Policy makers should take the opportunity to work in partnership with the private sector to jointly invest in critical digital and telecommunications infrastructure in those areas of rural Ireland which have proven not to be viable for commercial investment alone. This should be undertaken at an accelerated pace to help these areas through an increase in the capacity and scope of connectivity services. TII believes that a neutral host solution should always be considered first to help the costs of deployment and to avoid unnecessary duplication of infrastructure across the country by individual operators.

TII recognises the constraints on Ireland’s public finances and wishes to highlight the role that the private sector can play in the deployment of digital infrastructure critical to employment and social inclusion through the enablement of the digital economy and digital public services.

The potential and the capability for digital acceleration has been displayed during the pandemic and now is the time to capitalise on these learnings. Holistic policy solutions and the associated funded implementation plans must embrace industry and society, avoiding the current situation where disruption due to “blackspots” affects daily life, employment, and income for some much more than for others, depending on where they live or in which sector they are employed.

National Broadband Plan

TII is supportive of the National Broadband Plan and its ambition to deliver on the Government's commitment to ensure every citizen, wherever they are in the country, has access to high-speed broadband. TII strongly supports the acceleration of the delivery of the National Broadband Plan through the strategic enablers proposed by the Strategy.

International Connectivity

Appropriate international connectivity is a key area for Ireland and will be essential to ensure that we become and remain the Digital Hub that is envisaged in the Digital Connectivity Strategy. Government needs to ensure that the correct planning and regulatory frameworks aligned with our EU competitors are put in place to the planning and timely delivery of the requisite subsea cables both arriving to and departing from Ireland to Europe and beyond. TII welcomes the recent enactment of the Marine Area Planning Act 2021 and the National Marine Planning Framework. However, TII notes that this legislation has yet to be commenced and the associated secondary legislation is still outstanding. It is positive to see the allocation of the additional administrative resources to this crucial policy area; however, delays remain significant and will require immediate mitigation in both staff and process to ensure Ireland reaches the ambition envisaged by the Strategy.

Mobile Phone and Broadband Taskforce

TII members believe that the Mobile Phone and Broadband Taskforce has proven a very useful forum for engagement between all stakeholders and has resulted in concrete actions, the benefit of which became evident when industry responded to the connectivity challenge posed by the Covid-19 pandemic. TII called for and supported the establishment of the reconstituted Taskforce and is engaging with it in a proactive way. Unnecessary administrative, planning, and regulatory hurdles hinder the deployment of very high-capacity networks, fibre (both in the National Broadband Plan intervention area and in areas served by the private sector) and of mobile networks, including 5G. TII reiterates the need for streamlining of planning processes and procedures and a review of local authority policies and processes to ensure consistency between local authorities and transparency regarding process.

TII members urge that the Taskforce oversees the implementation of the EU Connectivity Toolbox initiative, in which E.U. Member States have committed to the timely implementation of best practice measures aimed at lowering the administrative burden placed on network operators by local authorities. The Taskforce can play an instrumental role in reducing these obstacles to the deployment of telecommunications infrastructure and the consequent improvement in service to consumers and businesses.

Broadband Cost Reduction Directive

The state should progress the long-stalled transposition and implementation of Article 8 of the Broadband Cost Reduction Directive (B.C.R.D.), requiring all planning permissions to contain a

requirement to ensure broadband infrastructure to an adequate standard is installed. This will help ensure all new developments and re-developments are 'broadband ready' by leveraging existing common and agreed open access technical specifications.

Regulation

ComReg plays a crucial role in ensuring a predictable regulatory environment. TII members require a clear and consistent regulatory environment so that stakeholders can rely on regulatory certainty. This certainty is important for investment decisions in VHCNs and in mobile networks including 5G. It is crucial for all stakeholders operating in what is a very capital-intensive industry because telecommunications networks depreciate at a pace almost three times that of other utilities. This puts an incredible strain on the return on investment, a factor which plays a key role in investors' decisions regarding future investments. It is important that as telecommunications technology continues to evolve that regulation and policy keeps pace with these changes, is future proofed to the maximum extent possible, and that the regulation facilitates connectivity on an international level.

In the context of the draft European Declaration on Digital Rights and Principles for the Digital Decade, we note that the European Commission is investigating whether big tech companies should contribute to network costs. TII members will engage in this policy debate.

European Electronic Communications Code (E.E.C.C.)

Telecommunications is one of the most highly regulated industries. The European Electronic Communications Code (EU Directive 2018/1972) is the new regulatory rulebook for the telecommunications sector. From the outset, TII has engaged intensively with the Department of Environment, Climate and Communications on the transposition of the Code.

Industry intends to comply fully with its obligations under the Code and to continue to engage fully with the Department, ComReg and the Data Protection Commission on the matter. It will be important that the approach to the transposition, interpretation and enforcement of the Code takes account of the regulatory principles enunciated above.

Spectrum

TII supports that the State's 5G spectrum continues to be released with appropriate coverage and deployment obligations and that the necessary spectrum is reserved for use by public services.

TII members need a spectrum policy environment which supports and encourages longer-term investment in connectivity and digital infrastructure. The forthcoming spectrum licensing process should be used to encourage investment in expanding the capacity of national mobile networks and strengthening resilience while avoiding unnecessary diversion of capital budgets towards spectrum fees. A long-term approach should be taken by focusing on the strategic goals of maximising network investment, and the concomitant service improvement, through

the acquired spectrum. Previously, the economic and social benefits of improved coverage were sacrificed in favour of the short-term goal of higher immediate spectrum fees for the Exchequer.

Another example is the tax policy position regarding the lack of tax relief on the purchase of spectrum licenses, the single biggest capital expenditure item by the mobile telecommunications sector of the industry. Ireland is an outlier in not providing capital allowances for expenditure on spectrum. This may impede Ireland in realising its Digital Decade's programme targets, as well as impacting negatively on the deployment of digital infrastructure and 5G, and thus our attractiveness as a location for foreign direct investment. If Government does not address this issue, it risks the achievement of the Digital Connectivity Strategy's objectives.

Telecommunications operators have invested massively to upgrade their network infrastructure and increase capacity, and, thanks to this, voice and data communications functioned smoothly during the Covid-19 crisis despite the very substantial increases in peak time fixed and mobile traffic. The benefits of state and industry collaboration were particularly evident when industry cooperated with ComReg to ensure capacity was available through the Covid-19 crisis to help manage mobile data demands and fundamental shifts in patterns of use on mobile networks, via the temporary spectrum allocation measures. This collaboration was critical and demonstrated what can be achieved effectively and efficiently when the objective is clear. In the longer term, continued investment is fundamental to ensuring the unrestricted access and participation by citizens in our digital society and economy.

Unlicensed Spectrum

ComReg should be requested to devise a programme to ensure the quick availability of license-free spectrum as new bands emerge, including:

- Radio local area network spectrum to support services such as WiFi 6e etc.
- Unlicensed 5G spectrum for enterprise and home use

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

Licensed Spectrum

ComReg should also be requested to devise a programme 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 V.H.C.N.s encouraged, especially in the context of mobile base station and fixed wireless access backhaul.

Network Integrity, Security and Modernisation

TII members are committed to working with the State to safeguard the security of all telecommunications networks and services and to helping the capability of both the public and private sectors to respond to cyber threats. TII welcomes the increased funding of the National Cyber Security Centre (N.C.S.C.) announced by Government last year. This is because while the telecommunications sector invests heavily in cybersecurity, certain essential functions in this regard can only be discharged by the State via the N.C.S.C. The adequate discharge by the N.C.S.C. of these functions is essential to protect both citizens and the digital economy and it is essential that the planned increase in its expert staff takes place within the timeframe announced by Government in 2021.

Copper 'Switch-Off'

The decommissioning of other legacy networks and migration to fibre/new technologies will be important while still safeguarding consumers and assuring business continuity, where appropriate. TII recommends a government led communications campaign in conjunction with ComReg and industry to inform and educate the public regarding the implications of the copper 'switch-off'. It is also critically important that ComReg ensures there is transparency for industry on the copper 'switch-off' process, and that a forum is created for stakeholders to discuss relevant issues. In this context it is worth noting that on 28 March 2022 ComReg published a consultation "Framework for the Migration from Legacy Infrastructure to Modern Infrastructure".

Research and Innovation

TII members are willing to explore potential partnerships in areas of research and innovation relevant to the sector and are willing to engage with the State on ways the industry can support relevant research and innovation initiatives.

Smart Cities/Towns, Rural Communities and Transport Corridors

TII is supportive of the implementation of smart solutions in our cities and towns and, where appropriate, will work with local authorities and relevant stakeholders to deliver these initiatives. It is important that the Government fosters the technological ecosystems required to facilitate the deployment of Smart City or rural connectivity initiatives. It may be necessary for Government to be proactive in supporting their delivery, particularly in rural areas where the services in question may not be commercially viable.

Access to affordable backhaul routes is an issue in certain locations. Irish backhaul routes have traditionally, where available, been relatively expensive when compared to their European peers. Access to common duct infrastructure for all carriers would be a useful development. Industry recommends legislation that requires the construction of fibre tunnels along all new major road and rail infrastructure developments. This would be useful and would limit the need

for future road opening works as all operators could access their fibre without having to dig up the road. TII also suggests opening access to existing networks or incentivising new developments on canals, roads, railways, and greenways.

Questions

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

The telecommunications industry agrees with the thrust of the Digital Connectivity Strategy and welcomes its publication. It believes that it is already well on its way to reaching the Digital Connectivity Strategy's overall target for fixed and mobile connectivity from now until 2030 which aligns to the E.U.'s Digital targets for 2030 as set out in the E.U.'s Digital Decade. In fact, Ireland is on track to reach the E.U. Gigabit connectivity target by 2028, two years ahead of schedule. The focus on the delivery of 5G to all populated areas is highly commendable. However, TII notes that it is not always commercially viable to deliver telecommunications infrastructure on an economic basis in some rural areas. Therefore, TII recommends some level of State support in this instance to allow for State and industry collaboration to close connectivity gaps and ensure that no person or community is left behind.

TII believes that the following two key aspects of the Strategy should be re-evaluated. The timeframes envisaged in the Strategy 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. For examples, the State could aim that by 2024, all State agency and public service office locations must only be connected using Very High-Capacity Networks, and, within 3 years of the launch of the Strategy, aim to implement 5G applications for the public service.

Q2. 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.

Individual TII member companies will respond directly on this issue.

Q3. 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?

TII member companies support the strategic enablers set out in the State's Digital Connectivity Strategy and believe they are appropriate. However, for telecommunications operators to meet the 2030 objectives, all the strategic enablers must be implemented promptly to ensure that all the telecommunications infrastructure and services required can be delivered to allow the Strategy to be implemented within the timeframe envisaged. TII members point to the major delays caused by the planning process and appeals system which have the potential to negatively impact on projects under most of the Strategy's strategic enablers. Additionally, Irish backhaul routes have traditionally, where available, been relatively expensive when compared to their European peers. TII suggests opening access to existing networks or incentivising new developments on canals, roads, railways, and greenways.

Q4. 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.

TII recommends the establishment of a dedicated expert working group, including industry representatives to assist in identifying and agreeing on the best practices, and, in the implementation and updating of the Digital Connectivity Strategy.

TII recommends the allocation of additional staffing resources within the Department of the Environment, Climate and Communications and the Department of Housing, Local Government and Heritage along with a defined industry engagement process and timeframe as the most effective way to advance the Strategy. This should include clear dates for completion of every individual element of the Strategy and associated milestones agreed with industry and all other relevant stakeholders.

The State should consider supporting the local authorities further with additional resources, beyond the Broadband Officer role. Further “joined up” management in local authorities, learning from the example of the success of the Road Management Office, would be very beneficial, especially in areas connected to infrastructure roll out.

The initiative of Dublin City Council in establishing a dedicated telecommunications office is a model that should be highlighted as best practice. Local authorities should be funded and strongly encouraged to copy this model, adapted as appropriate to their own individual circumstances. Ideally these offices would be integrated in a manner like the Road Management Office to provide for a single point of contact for telecommunications network operators.

While there has been much progress by the Joint Utility Local Authority (J.U.L.A.) Group, the “Guidelines for Managing Openings in Public Roads 2017” (“Purple Book”) is not being consistently adhered to. A greater focus on consistent compliance is required by all local authorities to ensure better collaboration. An increased emphasis is needed on ensuring that there are no excessive and unnecessary requirements which amounts to betterment or “gold plating” by the local authorities.

ComReg, or another body, such as the one described above, should be established and resourced to provide guidance on E.U. best practice implementation of the Single Information Point provided for in the Broadband Cost Reduction Directive. ComReg recently stated that it did not have sufficient information gathering powers regarding non-Electronic Communications Networks and Services (E.C.N. and E.C.S.) owners of network infrastructure. This gap needs to be addressed as part of the E.E.C.C. transposition implementation process.

Q5. 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 the Digital Connectivity Strategy can be delivered. The Department would welcome suggestions on the State’s role in encouraging the development of this workforce.

TII recommends the short-term engagement of subject matter experts in both the environmental and legal areas by Department of Environment, Climate and Communications to clear the backlog of applications for licences while it recruits the necessary skilled resources on a permanent basis. A project should be undertaken to define the skills needed and to quantify the future demand to avoid any future administrative obstacles to the deployment of telecommunications infrastructure due to a shortage of skilled labour.

It has been estimated by industry sources that the current skilled labour shortfall for the deployment of V.H.C.N.s could amount to circa 2,000 individuals. The state should work with industry to develop a suite of apprenticeships, including the current two-year apprenticeship for telecommunications and data network technicians³. Any State funded telecommunications infrastructure project should have an obligation to have an appropriate number of apprentices with a targeted level of gender and age balance.

Q6. The Department welcomes any other general observations and views on the State's Digital Connectivity Strategy and how it can be improved.

As stated previously TII believes that the significant investment in 5G and the major transformative benefits it offers could be negated by the enormous and sophisticated deluge of online disinformation that 5G is harmful to human health, a claim contrary to all reputable scientific opinion. This disinformation is so sophisticated that it may well originate from a state actor. It has caused a significant level of objection to the deployment of 5G due to the public concern it has generated. The public are entitled to be proactively informed by the authorities of the scientific facts regarding 5G in way that is both accessible and independent. TII recommends that the Government leads a communications campaign to counter the disinformation. Such a campaign can be funded by a miniscule proportion of the enormous sums the Exchequer will receive from industry in 5G spectrum fees and will complement industry's ongoing efforts to inform the public about 5G.

The Department should request and fund the National Competitiveness and Productivity Council to monitor and report annually on the state of digital connectivity and its impact on the business community compared to other competitor countries, this review to be done in the context of the implementation of the Digital Connectivity Strategy.

There have been significant delays with the transposition into Irish law of measures such as the E.E.C.C. and elements of the existing Broadband Cost Reduction Directive (B.C.R.D.). There is also a plethora of necessary initiatives to maintain the pace of Ireland's transition to a fully digitally connected society. The Department of Environment, Climate and Communications itself needs more internal resourcing in term of expert staff to enable it to fulfil its demanding mandate regarding national telecommunications policy.

³ <https://www.apprenticeship.ie/career-seekers/get-started/learn-more/ict/telecommunications-data-network-engineering-technician-l6>.

At an E.U. level, a further update to the B.C.R.D. is being consulted on, and the Network and Information Systems (N.I.S.) Directive (N.I.S.2) is pending. Ireland should support and encourage the inclusion of the fullest and most comprehensive set of measures in both.

Telecommunications Industry Ireland

Telecommunications Industry Ireland is the Ibec representative group for the sector. Its members account for the vast majority of industry investment and employment.

For further information please contact:

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