

## **Appendix 16: Costing for Fianna Fail Communications, Energy and Natural Resources – Capital Costing**

### **Overview for Qs. 122, 123 and 124**

The project referred to in this correspondence appears to be a market intervention to provide 100% geographic access to mobile telephone services. The limited detail provided does not identify whether the proposal is to achieve universal coverage at fixed premises only or 100% geographic coverage or the minimum level of service proposed i.e. 2G, 3g or 4G.

The correspondence refers to a similar project in the United Kingdom to deliver universal geographic access to 3G mobile telephony services. The UK programme relies on state aid to deliver the required mobile telephone infrastructure in areas the commercial market will not serve (state aid decision SA.35060 (2012/N)). It is predicted the UK investment will be concentrated in “rural and remote areas (e.g. mountainous regions and National Parks)”.

DCENR is not aware of any costing of a commencing similar project in Ireland, whether for mapping or construction of infrastructure.

**122 (Undertake a National Mobile Phone Coverage Audit)** is about a National Broadband Project (NBP) type intervention to ensure access to mobile telephony (2G, 3G or 4G?).

Surveys published by ComReg on access to mobile services are conducted to the level of national roads only. The NBP is based on a comparison of data sets of premises and areas the commercial market is serving or planning to serve.

Universal geographic access to mobile telephone services would require more detailed surveys beyond those conducted by ComReg or as part of the NBP. Surveys would have to extend to the level of rural roads and beyond to plan for universal geographic access.

DCENR does not agree that applying an estimate of costs to map geographic access to mobile services, which is based on costs for mapping access at fixed location only, will deliver a reasonable estimate of the likely costs.

### **123: Implement National Mobile Phone Infrastructure Plan:**

The same situation pertains in relation to this proposal as to the proposal contained in 122. The mapping analysis conducted in respect of the NBP which has resulted in the High Speed Broadband Map 2020 is not directly relevant to the proposed national mobile phone infrastructure plan. The backhaul costs of providing mobile services may reduce after the NBP project is completed, if it increases access to backhaul. The costs of providing universal access to mobile services may be higher for the last mile or so if each supporting mast serves a small number of users or mast installation is required in even more remote locations to achieve universal geographic access. The costs would also depend on the access proposed e.g. 3G or 4G.

There are many variables. DCENR has no data available to comment on the proposal to base an estimate on costs on a UK estimate of £150m.

**124: Accelerate implementation of Universal Fibre Broadband to the Home:** The National Broadband Project ( State Intervention) is currently undergoing procurement. Pending finalisation of that process and in adherence with EU State Aid rules, a strict approach is being taken to technology neutrality. Accordingly, DCENR is not in a position to comment on any approach outside of delivery of high speed broadband. In addition, a definition would need to be provided for accelerated implementation in the context of delivery of fibre. In September 2015, the Government’s Capital

Plan to 2021 confirmed an allocation of €275 million for the first five years of the NBP network build-out. Included in that amount is the sum of €75m which is earmarked for ERDF funding for the NBP. That funding does not appear to be relevant to the proposed project (accelerate implementation of universal fibre broadband to the home).