

Response to the Ofcom consultation on the Strategic Review of Digital Communications.

1. Rural Broadband provision is not just a question of technologies (FTTC v FTTP, ADSL v VDSL, etc). Nor is it just a matter of budgets or schedules. It is, essentially, a matter of the rights of citizenship.
2. The realities of rural broadband right now are that, if you live too far from a fibre-enabled cabinet, you are already hugely disadvantaged on a sliding scale from “adequate — for now at least” to “untenable”.
3. A Universal Service Commitment of 2 Mbps is not true broadband connectivity — it’s email. Slightly better speeds of, say, 2.5–3.5 Mbps such as I currently receive are adequate for general daily use, given a little patience, but not for heavy streaming requirements. But when internet content providers — from designers to content-hungry clients — assume there is a sufficiently viable national superfast standard of, say, 80 Mbps, everyone on single digit speeds will be left for dead. Based on my experience of the IT industry since 1985, I would estimate this step to be only two or three years away.
4. Before I consider the implications, here is the context to my response. I live in a rural village in the South East (Mountfield), just a few minutes from mainline rail access (Robertsbridge or Battle), ten minutes from one of the larger market towns (Battle) and with major shopping towns in easy reach (Tunbridge Wells, Eastbourne, Hastings, Brighton). This isn’t the back of beyond; it’s non-Metropolitan England. We have a fibre-enabled cabinet approximately 1.5 miles from the host exchange. Both the exchange and our satellite cabinet were early on the county schedule of implementation and so were among the first to set alarm bells ringing.
5. As a rule of thumb — and it is a rule of thumb that can be applied across every parish in the predominantly rural county of East Sussex and, I’m prepared to bet, across all the non-

Metropolitan counties of England — the current situation can be expressed as follows.

6. Approximately 25% of households can receive Superfast Broadband speeds of around 80 Mbps. About 50% can receive between 3 and 8 Mbps. And roughly 25% can achieve speeds of between 0.5 and 3 Mbps. So, given the argument in para 3 above, 75% of my village will be “parish poor” in broadband terms within a matter of two or three years.
7. I shall define the “parish poor” but first we need to recognise how the problem is perceived by those who are meant to be meeting current needs. When approached, the senior officer responsible for the implementation of rural broadband at East Sussex County Council responded:

We recognise the concerns you raise, however, inevitably there will remain premises that simply cannot be reached for whatever reason, be that technical, financial or other associated reasons. My team continues to explore every avenue to push coverage even further although, again inevitably there will come a point when the public purse can do no more. (16th July 2015)

This is not the first time that such a view has been expressed by our county authority’s officers and it is shocking that such a possibility should even be admitted. Sadly, I suspect there may be other authorities who are prepared to write off the rights of a certain section of the population.

8. My village is not in the outback. The properties are not remote hill farms. They all receive a Universal Service Obligation for their post. None of these properties is off grid for electricity. Or without mains water. Their roads, often unclassified lanes, are maintained by Highways. They get their rubbish collected. Also their recycling and garden waste. These are — well — ordinary households that just happen not to be in a conurbation.
9. So let’s look at those “parish poor”. They include anyone who wants use distance learning methods to gain another qualification to further their career. That’s a right for any

British citizen. And anyone who wants to access or download a local planning application (locally only available online). That's genuine freedom of information right which allows people to become involved as responsible citizens. Or those who need to access DEFRA or RPA to download or file data. That is a professional need. Or are self-employed and required to file PAYE details to HMRC. That's a legal requirement with stringent penalties. Or anyone wanting to consult local or central government legal or planning portals. Or anyone wishing to set up a business, particularly if it is sales based. Increasingly, school work requires internet access at both primary and secondary level. Increasingly, estate agents and property sites (e.g. RightMove) are providing the internet access speeds alongside the other utilities such as mains drainage. So internet speeds can now directly affect property value and property sales. The list could go on — and I haven't even talked about the leisure side of things such as booking holidays, making travel arrangements, gaming, movies, music via Spotify or similar, etc. It's easy to dismiss these as non-essential but a kid in the playground who can't join in the conversation about gaming or the latest YouTube sensation is socially disadvantaged.

10. So there is a section of the population who are socially, professionally, economically disadvantaged and effectively disenfranchised in terms of their basic rights as British citizens. The reason they do not have the same rights as other citizens is not because of the colour of their skin or their race. That would fall foul of race legislation. They are not disabled by being in a wheelchair. That would contravene access legislation. They are not excluded for reasons of gender. That would be contrary to equality legislation. Their disability is caused by the fact that they live too far from a (fibre-enabled) metal box by the side of the road — and by a lack of political will, understanding and competence. And before anyone tries to point out that all solutions require adequate funding, I would say that all funding is useless without competent design, competent procurement and competent implementation— see Postscript below.
11. I hope I have made my point so will not labour it further.

My recommendations are:

- **To recognise that it is not the properties that are the problem (see para 8 above) but what does or doesn't happen this side of the cabinet — the age of copper is over.**
- **To actively prioritise the broadband disabled and the internet disadvantaged with the budget and the vision to bring them into some sort of parity with the rest of the population.**
- **To ensure that any future benchmarking is not fixed; a static benchmark in a fast developing environment is fatuous so make target undertakings and benchmarks performance-linked i.e. relate the minimum target to what's actually developing in broadband requirement rather than 2 Mbps, 10 Mbps, etc.**

POSTSCRIPT

“To give you a rather interesting view, we completed a project recently in which the island of Jersey has installed fibre to every office and home at 1 Gbps; that is, 1,000 Mbps both ways. It is cheaper than copper, and it is there to enable a new economy. They have a monoculture of banking, and they need to change the economy of the island. That has got to be founded on the ability to communicate globally. They have already done all of the offices, so every company has access to 1,000 Mbps, and they are now rolling out the homes.”

Dr. Peter Cochrane, OBE

Former Chief Technological Officer of BT

in evidence to The Select Committee on Communications, Inquiry on Superfast Broadband,

Tuesday 20th March 2012, page 2.

<http://www.wrayvillage.co.uk/documents/cochraneHOL.pdf>