

1. Introduction

Sinn Féin welcomes the opportunity to respond to this consultation process.

Sinn Féin believes wide access to the most up to date telecommunications infrastructure is vital if our economy is to compete globally.

We therefore welcome the progress that has been made to date on the issue of this license.

However we are disappointed at the unfortunate delays in this process that have taken place to date and would like to see a speedy resolution of this licensing process.

Sinn Féin is fully supportive of the needs of rural communities and feels much greater pressure must be put on telecommunications operators to provide adequate coverage in remote areas; to date this has certainly not been the case.

2. Telecommunications Powers

Firstly and most importantly, Sinn Féin firmly believes that telecommunications in Ireland should be managed on an all-island basis.

This is in keeping with recent developments for strategic infrastructural arrangements such as the Single Electricity Market (SEM) and the proposals for Common Arrangement for Gas (CAG)

For too long, operators have neglected rural border areas in terms of infrastructural investment while profiteering from consumers that carry out business, or are based close to the border, through extortionate and often inadvertent roaming charges.

In light of this, Sinn Féin is proposing telecommunications powers be transferred to the Executive in the north of Ireland and that this devolution process should commence as soon as possible.

Sinn Féin believes the license for the north of Ireland should be awarded in conjunction with the license for the rest of Ireland in order to begin this process.

Sinn Féin are aware that Ofcom has no statutory powers to deal with roaming charges, but carrying out such an all-island licensing process would effectively bring an end to roaming charges in Ireland while at the same time making it less attractive for telecommunications providers to neglect border areas. We feel this should be a key objective of the license.

If however, the current situation remains, then Sinn Féin would like to make the following comments.

3. Response to the proposals

Sinn Féin has concerns about some of the aspects of the proposals that deal with competition and feel that much more needs to be done to create a level playing field for all operators and to improve both transparency and confidence amongst consumers.

Sinn Féin believes this license process needs to be completed as soon as possible but also that the terms of any license needs to be clearly advantageous for both operators and consumers.

We understand that without a proper incentive to private enterprises they may decide not to come on board.

However, we also believe that ensuring proper telecommunications coverage is paramount and therefore urge greater protection to be given to rural dwellers through the terms of this license.

The terms of the 3G license failed rural communities abysmally and Sinn Féin are glad that many of the glaring mistakes that were made in the awarding of those licences have been addressed, particularly in terms of massive gaps in telecommunications coverage in predominantly rural areas.

However, we fear that the same areas that have been neglected to date for 2G coverage, for 3G coverage, for fixed line broadband, for digital television and for digital radio will be the same areas that will be the 2% that are left out of this process.

Sinn Féin believe there is an opportunity here to put the best possible telecommunications network in place through the proper awarding of this license and we feel that much more ambitious terms need to be put in place.

Sinn Féin welcome the announcement by the British Government that it is to invest £150 million in rural mobile phone coverage; however we would have serious concerns about how much of that will be used in rural areas in the north of Ireland.

These concerns originate from the pitiful funding that the Executive was awarded as part of the Broadband UK fund; to be given £4.4 million from a total fund of £530 million.

This was followed by a further £100 million investment in cities, which already have high-speed internet access.

Sinn Féin believe that the awarding of 4G licenses are a key way of meeting the ambitious but achievable targets set out by the European Commission on broadband provision.

The EC states that **ALL** citizens should have access to basic broadband by 2013 and have access to broadband faster than 30mbps by 2020.

We believe the proposed recommendations will not greatly assist in reaching those targets, as some of the same citizens that are unable to get broadband now will remain in that position unless something drastic changes policy wise within the telecommunications industry, which is rapidly evolving all the time.

We understand that there are two approaches, which can be taken to incentivise operators to invest in rural areas; a carrot or stick approach if you like.

The carrot is the provision of additional resources whereas the stick is to put the proper conditions within the license at this early stage.

Sinn Féin is of the belief that a simple 98% measure of the entire population of Britain and the north of Ireland is inadequate and will not provide people living in rural areas with adequate coverage.

Sinn Féin would like to see a situation whereby at least one licensee was obliged to provide coverage in at least 98% of each postcode area, regardless of the number of people that live in it.

We believe that such a license would still be financially attractive and feasible to investors but would provide a greater level of protection for the rural community and businesses.

Sinn Féin is concerned about where the revenue generated from the sale of this license will go; we would not be supportive of it being used simply as a revenue raising option.

Whilst we appreciate that it may well be an important source of revenue for any government, we would like to see a significant proportion of the money being used to further incentivise operators to invest in rural coverage.

We also feel that there is scope and merit in using the money to provide free and impartial advice for telecommunications users who find it difficult to access such a service in a very competitive and fast moving market.

Sinn Féin welcomes Ofcom remarks around the changing nature of telecommunications against the backdrop of the huge surges in demand for mobile data that we have witnessed lately.

This trend will continue and Sinn Féin believes operators must ensure adequate capacity is in place at all times to deal with such demands.