

Ofcom second consultation on assessment of future mobile competition and proposals for the award of 800MHz and 2.6 GHz spectrum and related issues

DRAFT Response from Orkney Community Planning Partnership

The Orkney Community Planning Partnership is concerned about the scope of Ofcom's proposals to extend 4G mobile coverage and fears it may further increase the unacceptable gap in provision between small remote populations, like Orkney, and those of urban UK and more accessible rural areas. This would have a detrimental affect on Orkney's social and economic sustainability and could jeopardise the Scottish Government's stated objective to exploit the potential of marine renewable energy in Orkney's waters.

The consultation proposes how best to sell off rights to the next generation of mobile networks, parts of the bandwidth previously used by analogue TV wireless. Whilst the Orkney Community Planning Partnership welcomes the improvements made since the first consultation – in that a higher population target is reached, from 95% to 98% – in real terms, this would mean that 1.2 million people in the UK would not be included in the coverage obligation. The Orkney Community Planning Partnership fears that with a population of just 20,000 this puts Orkney at a significant risk of falling within this forgotten 2%. The Orkney Community Planning Partnership contends that the coverage should target 98% of all sub-regional UK populations at NUTS Level 2.

We welcome news that the Government has decided to invest £150m in a mobile infrastructure programme to improve mobile coverage in rural areas and the coverage obligation will be linked to this mobile infrastructure programme. However, the consultation proposal is that only one licence contain this obligation. This will restrict choice and competition within these areas and the service level and charges levied by the successful bidder will therefore have to be carefully regulated and monitored to ensure effective and affordable service provision. In addition to this, the Orkney Community Planning Partnership is concerned that this £150m programme is required to cover a vast geographical area and that Orkney, or large parts of Orkney, may be excluded.

Remote areas such as Orkney have arguably a greater dependency on advanced mobile telephone and broadband services than urban areas. The technology can be used to help sustain vulnerable populations by allowing opportunities for home working and distance learning. There are also many crucial safety issues associated with effective mobile telephone coverage. For example, providing alerts to pupils and parents upon the onset of adverse weather conditions resulting in unscheduled school closures, and as a potentially life-saving service for a large workforce of self employed farmers and fishermen, often working alone in dangerous conditions. In addition Healthcare services are increasingly delivered and accessed online, however a division is becoming more apparent between those who have access to mobile and broadband and those who do not. This is becoming more complicated as more health and care services are being offered online as well as the increasing digital management for electronic medical records and data transfer between specialists seeking to increase efficiencies within the Health Services. The trend toward the digitisation of healthcare will risk leaving many in Orkney un-served and under-served on the wrong side of the division if investment is left unaddressed.

The sea around Orkney will play a major role in the development of the UK marine renewable energy industry. In anticipation of future commercial development, The Crown Estate Commissioners have already awarded seabed leases over a significant area within Orkney waters. All wave and tidal energy devices will require to be monitored from nearby onshore bases and restricted mobile coverage in the Orkney area could therefore affect our ability to meet developers' needs. This could further cause the UK to fail to meet its carbon reduction

targets and to lose out on the wider economic benefits which will inevitably flow from this major new industry, wherever it is established.

With demand for, and usage of conventional wired communications now gradually diminishing, continued investment in this type of infrastructure will also diminish, further increasing the vulnerability of remote and island communities. Restricted communications will also inevitably act as a substantial barrier to future tourism, an industry of significant importance to rural Scotland. Whilst the Orkney Community Planning Partnership recognises that the current proposals may deliver benefits to the vast majority of the UK population, we believe that not enough is being done to protect remote rural populations, who will become increasingly dependant upon new technologies such as 4G for their future survival.