

Para 1.7

A USO providing 10mbps may be adequate today. The USO will not be in force for some time and there are constant increases in the speed required to achieve a reasonable service. It would seem more appropriate to set the initial USO at a speed that will be appropriate when the obligation will have to be fulfilled.

The other technical issues listed are a serious issue for satellite systems. Latency can make a service with a sensible download speed almost unusable. For example, we find shopping on a supermarket site nearly impossible using our satellite (nominally 10mbps), but merely very slow using the Openreach land line system (download speed between 1.2 and 2.5). Similar issues arise on many other sites.

Para 1.10

Our unacceptably slow service costs the same as a "reasonable" service, although there are higher prices for superfast. If the USO is set at the low level currently proposed it should always be on a lower tariff. If it is set at a more realistic level then there should be a "social" tariff. Value for money is a key government phrase, yet it is not apparently considered relevant in this consultation when applied to consumers.

Recognising the cost implications of rural areas we would be prepared to pay a significant amount for the initial installation, either up front or spread over a period, on the basis that we had a reasonable service. In today's terms that would mean a superfast service comparable to an urban superfast connection i.e. significantly faster than the proposed USO. There would be no purpose in paying for the USO as currently proposed, as it would be unlikely to be fit for purpose at the date of installation.

Para 1.11

I would support a social tariff for the USO minimum service, but not for any service in excess of that level.

Para 1.12

I do not have population figures, but based on the absolute number of people, as opposed to the percentage of the population, I believe that the disproportionate effects between Wales, Scotland and NI, compared to the UK, are not as suggested here.

Para 1.14

I cannot comment on overall broadband demand, but note that the consultation suggests higher take-up than expected. In my parish there are a number of businesses all of whom find our broadband speed a challenge. Much of the interaction with the government is now required to be online, and I know my business is now almost impossible to run due to limitations of broadband. It is assumed by all providers, governmental or commercial, that everyone has good connectivity.

Para 1.19

You refer to competition. In many rural areas, where the USO is likely to be important, there

is only one service provider, with satellite as an alternative. In these circumstances there is no effective competition. Satellite and land-based services are not easily comparable. There is a choice of ISP but that does not give any choice of infrastructure. Price/service competition is required among the infrastructure providers to achieve any improvement. Clearly that is not likely in rural areas.

Para 1.22

One of the purposes of a USO is that it spreads the fixed costs across the entire population. If that were not a primary purpose there would be no need for a USO as everyone would simply pay or not, and clearly the latter is not considered acceptable.

Para 1.23

I cannot comment on this paragraph, except to say that modifying the technical specifications for some areas would destroy the USO.

Para 1.31

The USO period needs to ensure that customers reliant on the service at the USO service level are not disadvantaged when compared to the population as a whole. Seven years ago, when we moved to our current property, a speed of just over 1.2 mbps was adequate for business and domestic purposes. Not long ago the expected speed for all was 2mbps, and now the expectation is 10mbps. That suggests a very rapid rate of change, and a review period of not more than 2-3 years. That is not consistent with the need for providers to recover fixed costs. The length of time to the first review, and between reviews, is dependent on the initial speed and the reviewed speeds set for the service. For example, if the 10mbps speed is set it is likely that a review will be required almost immediately. If an initial speed of 20mbps is set it is likely that a review will not be required for perhaps 5 years i.e. 2021.

Additional matters not covered by the standard questions

You do not mention issues with file transfer protocol (FTP). It is not possible to use some government services as there are issues with the FTP systems that are supported by satellite providers. On this basis satellite is not an acceptable part of any USO.

We are based in a remote rural area where capacity on the Openreach system is an issue. I would note that we also have inadequate telephone services from Openreach, and no mobile telephone service from any provider.

BT Openreach has installed a significant level of fibre optic infrastructure, assisted by various forms of public funding. None of this has delivered to the hardest to reach spaces. BT has been allowed to cherry pick where to install fibre optic infrastructure, based on commercial considerations. One effect of this is that those areas that are hardest to reach are now isolated from each other, making it more difficult for any other provider, including local and social enterprises, to fill the gaps.