

- Specification and scope of the USO

We feel that 10mbps is too low a minimum target, that this speed will already be considered inadequate by the time any USO is in place, and that 20mbps would be a more reasonable minimum. Provided that correct technological approaches are chosen, this is by no means a difficult standard to achieve. We also feel that upload speeds should be at least half of the download speed.

- Demand for the USO

Our local experience is that there is very strong demand for higher speed broadband across the board, and that there is a perception that access to a fast connection has become an essential service comparable with water and electricity. The 30% in this area with no access to fibre see themselves as being seriously disadvantaged, both in terms of business and the requirements of private life.

- Cost, proportionality and efficiency of the USO

Reliability would have to be on a par with current fibre performance. While those in harder to reach areas may expect to pay a little more than those in well-covered urban areas, the disparity should not be extreme: a maximum of a 50% premium, and either without caps or with caps of at least 100GB. We feel that given the correct checks to ensure that prices are not allowed to become disparate in different areas, competition will ensure that they are competitive without eroding profit.

- The universal service provider or providers

We have no view on who should provide the service, though it seems likely that the country and the market would be best served by a variety of USPs. Above all we would recommend avoiding a situation where a single large provider is able to achieve either a monopoly or a disproportionate degree of control over the market, unless that provider is state-owned (and remains so).

- Funding of the USO and potential market distortions

The current BDUK rollout of superfast has been badly distorted by the disproportionate influence of BT, and their determination to capitalise on their own copper network. We feel strongly that without BT's protectionism and exploitation of its position, there is a very viable market in all parts of the country to set up and maintain profitable high speed broadband networks using either fibre in almost all areas of England, or a combination of fibre and wireless in the less populated areas of Wales, Scotland and Northern Ireland.

Full low-cost access to the fibre backbone and major ducts should be available to all potential USPs, and rural communities should be actively encouraged to assist with any extension to ducting that is required. It would be desirable if consumers in all but the most challenging areas were to have a practical choice of provider, often involving a choice of technology.

- Review of the USO

The USO should be reviewed as appropriate, but at a minimum every five years. Sensitive issues such as pricing should receive permanent overview.