

We have responded below against the work plan headings set out in Annex 1 of the consultation document.

Ensuring European regulatory frameworks adapt: We would add a specific need for enhancing cross-border cybersecurity.

Improving information on fixed broadband speeds and availability: We are able to support you in this project and have the addressing data to do so.

Wherever possible, it would be prudent to plan these activities to assist 5G deployments as well.

Improving mobile coverage maps: Mobile coverage mapping can take 2 forms:

(1) Infrastructure-based mapping, determined by the interaction of transmission infrastructure and the nature of local geography, including terrain, vegetation and buildings.

(2) Crowd-sourced mapping, based on the quality of experience at different locations

We see these two forms as mutually reinforcing, and also necessary in a 5G environment, where short-range, high-frequency links will need to interconnect with fixed infrastructure.

We are the provider of the underlying datasets that make this activity possible. In the light of emerging 5G requirements, we would be most happy to assist you in this regard.

Helping SMEs to engage in communications markets: This should ideally also include helping them to improve their levels of Cyber preparedness based on CESG's "10 Steps Guide," as well as to better understand the compliance needs stemming from the upcoming general Data Protection Regulation.

Reporting on the consumer experience 2016: It is very important to achieve availability for all citizens and consumers as soon as is practicably possible. We understand that this is not a simple undertaking, but it is naturally of great importance to your customers.

Reporting on the UK communications market: You could consider adding information on awareness levels for cybersecurity issues and data protection issues as a way to raise awareness generally.

Reporting on the international communications market: We have heard recently that call termination rates for those calling into EU destinations from beyond the EU have increased. This might require your attention? We have staff globally who call back to UK. We would also not want to see rates between EU States increase.

Landline and fixed broadband quality of service: At section 2.2, your document rightly notes the dramatic increase in mobile data use, quoting 2014 data. Our information is that the data for 2015 is actually significantly higher - and this could cause QoS issues on mobile, which will also soon be carrying Emergency Services Traffic. To maintain QoS might there be a case for a study of some kind of "broadcast offload" of unidirectional traffic, that could be received by handheld devices rather than rooftop antennae? Might this potentially free up mobile network data capacity, which could also benefit the emergency services?

Supporting the UK Government on the broadband universal service obligation (USO): We recognise and appreciate the challenge of maximising the reach of broadband coverage,

and recognise that broadband infrastructure has a direct bearing on economic growth. We also understand that whether called universal access or universal service the end desire is the same - to prevent the creation of a digital underclass.

Today the UK does not have a single simple view of what broadband assets exist and where, but instead a mix of multiple datasets that do not provide 'a single view of the truth' and which make your job harder than it should be.

Core data does exist for fixed network assets, but in different formats. The same is true for mobile, with the added uncertainty that radio propagation models typically being used do not address IMT-2020 frequency ranges, since they were only agreed at WRC-15. Without the right form of infrastructure, capable of delivering the universal access/service speeds reliably, free of network bottlenecks, to everyone everywhere, the UK will not remain at the forefront of the digital economy. The deployment of future-proof ultrafast broadband infrastructure is absolutely vital for the future of our economy, and we stand ready to assist Ofcom in this.

A commonly agreed dataset of what is located where, interoperable with datasets of what might be connectable to what, including a definition of local infrastructure, might be of particular help, and assets could potentially be better utilised if one knew more clearly what was where. This would also help to speed up deployments, with consequent benefits to the economy. Today no single view exists of all utility infrastructure (including non-telecoms), let alone a view that encompasses data relating to flood risk, weather, buildings (including listed sites) etc.

The Home Office's Emergency Communications Programme, which requires 100% coverage for service by 2017 might also benefit from such a map. The benefits of a properly planned mapping solution, kept updated to reflect changes in buildings and other factors, is a measured and proportionate response that can be deployed rapidly to unlock additional economic potential