

Telecoms Branch
Department for the Economy
Netherleigh
Massey Avenue
Belfast BT4 2JP

By e-mail: stratum@economy-ni.gov.uk

Dear Sir,

NILGA welcomes the Project Stratum initiative from the Department for the Economy to identify which postcodes in Northern Ireland are not currently able to receive speeds of more than 30MB.

NILGA's member councils have been working with the Department to encourage residents and businesses to ensure that their postcode is included on the list if they are unable to receive an adequate broadband connection. There is a clear role for local councils to coordinate this information gathering and also to be consulted on subsequent plans for infrastructural development.

Therefore NILGA's response to this consultation will therefore be restricted to the following points:

- The latest OFCOM report noted that almost 89% of properties in Northern Ireland now have access to superfast broadband (an increase of 3% from 2017) but this lags behind that UK average of 94% and behind the government target of 95%. However only 67% of properties in rural areas can access superfast broadband, compared to 74% in the UK. The Department has estimated that approximately 100,000 premises and 25% of SMEs remain without access to superfast broadband.
- NILGA regrets that despite government subsidies of £77m since 2007, coupled with operator investments, 5% of premises in Northern Ireland (38,000) cannot receive an adequate broadband connection (of more than 10mbps), compared to 2% in the UK. While this number has fallen in the past year, most of these premises are in rural areas - one in five premises in Northern Ireland's rural areas are unable to access superfast speeds.
- With increasing moves towards the digital society, including applications for school places, the EU settlement scheme, taxing vehicles, agricultural and business returns, electoral registration; the provision of reliable and high-performance broadband across the region is central to the development of new opportunities for jobs, growth and social inclusion in Northern Ireland region.
- The breakdown by council area of premises which are unable to receive speeds of more than 10mbps, as well as those receiving superfast and ultrafast broadband in the Ofcom Connected Nations report of December 2018 paints a stark picture for many local council areas. We would call on the department to ensure through the tender documentation that telecoms companies

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direct their resources to the worst-affected areas – notably in Fermanagh & Omagh and Mid Ulster. If digital access is truly for everyone, we need to ensure that all of Northern Ireland has access to reliable and high performing broadband. Digital exclusion for residents of those council areas is not acceptable in the digital age.

- Project Stratum must take precedence over the Broadband Universal Service Obligation. This will ensure that fibre options are exhausted for rural customers before the USO options (which may include 4G /5G / satellite) are explored, to avoid the risk of creating a service which is not future-proofed. To deliver the fastest speeds, increased reliability and almost unlimited bandwidth, the tender documentation must specify “fibre to the premises” rather than take a technology neutral approach.
- We call on the Department to issue separate tenders for each council area under Project Stratum. This will show the individual cost to deploy fibre in each area and if there are insufficient funds to roll out a full fibre solution in each area, then local Councils should be consulted to determine if they wish to provide ‘shortfall funding’ in order to achieve a full fibre future-proofed solution for their area.
- In addition to a future-proofed service, Project Stratum should be rural proofed. The Department must not allow telecoms providers to yet again pick off the ‘low lying fruit’ first in easy to reach ‘built up’ areas where it is less expensive to deploy broadband services. They must be directed by the Department to prioritise the areas which are worst affected first.
- Efforts by councils to regenerate their local economies and contribute to a balanced regional economy are hampered by the absence of a fit for purpose digital infrastructure. Government must intensify its efforts to bridge the broadband gap between Northern Ireland and the rest of the UK by upgrading the broadband infrastructure.
- We would encourage government to examine an all-island approach to connectivity and growth to enhance the attractiveness of areas outside the main urban centres. As most of the premises which are not able to access speeds of 10Mbps lie in border county areas, there can be a natural synergy if policy makers and operators can work together to provide solutions for the border counties. As a first step the potential for collaboration should be explored with existing vehicles such as the North West Strategic Growth Partnership, the Irish Central Border Area Network and the East Border Region, the North & West Regional Assembly and the East Midlands Regional Assembly.

Yours sincerely



Mr Derek McCallan
Chief Executive

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