

**Cllr Mark Winnington**  
**Cabinet Member for Economic Growth**  
County Buildings  
Martin Street, Stafford, ST16 LH



Website: [www.staffordshire.gov.uk](http://www.staffordshire.gov.uk)

Jack Gaches  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

[Broadband.USO@ofcom.org.uk](mailto:Broadband.USO@ofcom.org.uk)

Date: 13<sup>th</sup> February 2019

Dear Mr Gaches,

**Consultation: Delivering the Broadband Universal Service; proposals for designa providers and applying conditions**

Thank you for giving me the opportunity to offer comment on the Broadband Universal Service (BUS) provision as part of this consultation exercise. I write to you in the capacity of Cabinet Member for Economic Growth, and broadband champion overseeing the Superfast Staffordshire programme.

Superfast Staffordshire is a partnership between Staffordshire County Council, BT and Broadband Delivery UK (BDUK) who are working to deliver access to superfast broadband services across Staffordshire as part of the national programme managed by BDUK.

The partnership will be investing £34million across the county providing superfast broadband (>24Mbps) access to more than 96% of the premises by 2019.

Of course, this does mean that the “final 4%” of premises (approx. 16,500) will require further intervention, which in turn will be reliant on additional funding being made available through BDUK Gainshare reinvestment and from central government.



I would like to make the following observations about the Broadband Universal Service provision;

- When the original Universal Service Obligation (USO) was first proposed it is possible that 10Mbps may have represented a “decent” broadband connection. However, two years on I would suggest it is barely fit for purpose today and will most definitely not fit for purpose in 2021 when it is likely to be delivered. Internet usage is increasing bandwidth requirements, which are doubling year on year.
- The BDUK programme that has been successfully delivered across the United Kingdom, set the superfast broadband threshold at 24Mbps, and whilst the programme has delivered speeds in-excess of this speed floor (typically 50-80Mbps), it would seem to be more appropriate to set the BUS provision to a minimum of 24Mbps. This would serve to bring any properties below the BDUK threshold, up to the same starting point and encourage a fibre-based solution. Just to note the European Union equivalent superfast threshold is set at 30Mbps.
- Ideally, I would like to see a commitment for the BUS to adopt a “fibre first” approach, delivering a full fibre service whenever possible and only resorting to alternate technologies where the circumstances absolutely prohibit the provision of a full fibre service. I would expect these situations to be the exception rather than the rule.

This approach would also complement the government aspiration to get a full-fibre service to all premises by 2033, as described in the Future Telecoms Infrastructure Review 2018. There is a risk that additional public funding will be required to provide fibre services after the BUS has been implemented, when the desired outcome could have been implemented for the £3,400 BUS funding available.

- Where the costs exceed £3,400 per premise to deliver a full fibre service, future government interventions such as Rural Gigabit Connectivity and BDUK Gainshare could provide the required gap funding, or a voucher to ensure the network build. Should the build cost exceed the enhanced cost per premise (yet to be defined) the balance would need to be provided by the community, like the Community Fibre Partnership approach currently available.
- Given it is forecast that the BDUK Gainshare reinvestment fund is likely to be more than £700m over the life time of the programme, the Broadband Universal Service provision needs to be designed to complement the utilisation of this funding to ensure that the maximum full fibre coverage is attained, if we are to get the most out of this very successful programme.



- Whilst fixed wireless access, 4G and 5G technologies will undoubtedly have a part to play in the most remote areas, they need to be deployed as an “option of last resort” as a replacement for fibre broadband services.
- Given there is likely to be a degree of aggregation required to optimise the solution for any given area, it may be worth producing materials to circulate to communities, so that they can start to organise themselves and minimise any further delays in the process.
- It would seem entirely appropriate to appoint both Openreach and Keycom as the Broadband Universal Service Providers, given they both have extensive broadband networks and thus ample opportunity to upgrade to a fibre service within their respective geographic areas.

Residents and businesses who will be eligible for the Broadband Universal Service will have waited the longest to get a useable broadband service. Let us take this opportunity to provide them with a fibre network connection suitable for the 21<sup>st</sup> Century, and stop the digital divide becoming a digital chasm.

Yours sincerely

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Mark Winnington  
Cabinet Member for Economic Growth

Cc Paul Chatwin  
Superfast Staffordshire Programme Manager

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