

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to amend the treatment of excess costs in determining eligibility for a USO connection, where excess costs are above £5,000? Please set out your reasons and supporting evidence for your response.</p>	<p>The Advisory Committee for Northern Ireland advises Ofcom about the interests and opinions, in relation to communications and postal matters, of persons living in Northern Ireland. We are independent and our views do not represent the views of Ofcom or its staff. Members of the Committee have experience of broadcasting, independent production, mobile and fixed telecommunications and consumer and customer relationships. We are responding to this consultation from the perspective of customers actually or potentially impacted by the broadband USO in Northern Ireland.</p> <p>ACNI welcomes the opportunity to comment on the proposed approach to dealing with the issue of high excess costs.</p> <p>It is clear that a considerable amount of time and work has gone into producing this proposal, and presumably, negotiating with BT to agree these changes to the USO. The short timescales for the consultation, over the summer holidays, suggest that Ofcom is not anticipating significant concern with this proposal.</p> <p>Although outside the scope of this relatively narrow proposed change to the USO, ACNI would ask Ofcom to note, and address, the following views: -</p> <ul style="list-style-type: none"> • The USO is a safety net to prevent social and digital isolation. However, in our opinion this new proposal doesn't sufficiently further this objective. We understand it will protect all customers from increases in their bills, but it could increase

the digital divide as many consumers will be unable to afford these excess costs.

- We understand the need for BT to recoup cost, but the £5000+ figure will be cost prohibitive for many consumers. In a cluster, where the excess cost per household is more than £5000, BT does not have to commence build until there is agreement in place for the totality of the excess cost to be paid. This may result in situations where one household has requested, but others are unwilling (or unable) to pay their expected contribution, resulting in no infrastructure being built. Therefore, the potential customer who can afford their share is left without. The consultation paper is unclear as to how this situation would be addressed.
- We note that BT is being encouraged to “raise awareness” in communities to increase the contributions to the shared cost. Within these communications will BT be required to give a definition of “decent” speed broadband? Customers may pay significant sums for this USO, only to be left disappointed and feeling short-changed when they experience the reality of the performance of the infrastructure. This would need careful management, and it needs to be made clearer how performance of the USO would be reviewed on an ongoing basis to ensure it is capable of the ever-evolving expectations of broadband customers.
- BT is able to seek funding from new customers wishing to be connected

to broadband via the USO, but it isn't clear that there are safeguards which include, for example, new builds. Is BT obliged to take Local Authority planning development plans taken into consideration during the analytical costing phases?

- There is clearly a disparity between the realistic expectations of broadband customers in urban and rural situations. Has Ofcom fully explored other approaches to recouping the cost of delivering services in rural areas from the savings accrued from delivering high speed services in urban areas, which we are told can be done much easier and in much more cost-effective manner. They are also the areas that benefit from the fastest speeds, quickest repairs, maximum choice and latest advancements in technology.

A final thought, not specific to this consultation: Ofcom deals with incredibly complex, highly technical, and detail heavy issues, so how can Ofcom make its consultations more accessible to the people upon which the consultation outcomes and Ofcom's decisions directly have an impact?

END