

Your response

Question	Your response
<p>Do you have any comments on our proposals?</p>	<p>There are two points I would like to make.</p> <p>1. PAF I understand that Ofcom has the power to review the governance of UK address data and that it last did this in 2013.</p> <p>I suggest strongly that in 2021/22, Ofcom should review the cost and governance of the so-called Postcode Address File (PAF).</p> <p>In line with the strategic priorities laid out in section 3.2 of the plan of work, it should consider and assess: (1) the extent to which the connection between: (a) postcodes; (b) addresses; and (c) geographical locations and areas; is part of the essential national digital infrastructure; and (2) the extent to which the current arrangements, cost and licensing conditions for the PAF impede the development of the national digital economy.</p> <p>Ofcom should conclude whether or not, and if so how, the contents of the PAF should be licensed and made available as open data, using the widely accepted definition of open data from the Open Data Institute (theodi.org). If the conclusion is negative, it should lay out clearly the reasons why this is so.</p> <p>The aim of this work should be to enhance the national digital infrastructure and digital economy; in particular to enable better use and sharing of related geospatial data; and to encourage and aid the development of apps, software and other uses of geospatial data related to human activities.</p> <p>2. Broadband availability I would also like to broadly comment on your activities to ensure full-fibre roll-out and the reform of OpenReach, alongside the working of the USO.</p> <p>I have some first-hand experience of this but personal experiences are out of scope for this consultation. I'm happy to send more details if required or helpful.</p> <p>It suffices to say that the current arrangement is not effective at addressing the need for broadband rollout, especially in relatively deprived areas:</p> <p>1. OpenReach has too much business discretion in deciding where to roll-out fibre; any request for detail on how it takes this decision (in absence of schemes justifying the decision directly, such as Government vouchers and/or Community Fibre Partnerships) is declined and there is no way to influence it. There should be a requirement for OpenReach to consider deprivation. I can send specific examples of when this has created exclusion (e.g. areas where every cabinet "but one" has been upgraded to FTTC, etc)</p> <p>2. OpenReach is committed to FTTP and this is good; however, communities that are not included in the roll-outs and cannot afford a Community Fibre Partnership would benefit from FTTC roll-outs. The pandemic has highlighted why this is important:</p>

areas with high rates of school age children are trying to homeschool them on a 2MBps ADSL.

3. USO regulations should remove the ability for BT to “escape” recognising the USO in presence of a 4G connection. Once again, there are communities that cannot afford a 4G connection, that BT provides for much a higher price. The £46/month limit is too high for deprived communities.

4. USO regulation should put on BT the burden of *proving* that a 4G connection will comply with USO speeds (10 MBps download/1MBps upload), without forcing the customer to go through unnecessary tests with a 4G Hub, etc. BT is using this ability to delay recognising the need of a USO, and only allowing 14 days for the customer to cease the contract. The way this should work, instead: BT should visit the customer complaining about ADSL speed; an engineer should test the 4G connection straight away and assess whether it will be a solution or not.

5. The individual nature of USO regulation is such that BT escapes the need to fund more sustainable upgrades to the area where multiple households are suffering from the same problem. The USO should be amended to trigger a “collective” clause whereby if at least a certain number of households are reporting slow speeds, then the first attempt should be made to upgrading the cabinet.

Once again, happy to provide further details.