

**Ofcom Advisory Committee for Wales**

**The UK Communications Infrastructure Report –  
Ofcom’s proposed approach to its new reporting duty**

**Introduction**

Ofcom’s Advisory Committee for Wales (ACW) believes that Ofcom’s proposed approach to its new reporting duty does not sufficiently address:

- the nations and regions of the UK;
- businesses;
- the rural consumer; or
- low-income citizens.

Members would like to see a greater emphasis on customer benefit and service level satisfaction rather than relying solely on information supplied by operators in order to make a more accurate assessment of the UK’s actual capabilities rather than merely its theoretical capability.

Members are concerned by the security implications of a detailed assessment of Government and civil infrastructure and would like to know more about how sensitive information about national security and commercial confidentiality will be handled and reported.

Members would like to see Ofcom include an assessment of analogue radio as it still plays a fundamentally important part of Wales’ communications infrastructure.

**Overall Approach**

*Question 1. Have we got the scope right? Is the set of networks, services and operators we propose to report on appropriate and is our approach to data gathering and analysis correct?*

Members would like to see the type of customer, type of location and type of service defined more clearly. These three metrics (customer, location and service) are the drivers of infrastructure rather than technical considerations.

Members suggest that the report focuses on 3 types of customer, 8 types of location and 8 types of service:

Type of Customer: consumer, small & medium sized enterprise, and larger enterprise;

Type of Location: deep rural, rural village, small town, large town, city suburb, city, central business district/business park and trunk/main A roads.

Type of Service: static voice, on the move voice, static image, on the move image, static data, on the move data, sound UK broadcast content, image UK broadcast content.

Adopting customer benefit as a point of departure makes it possible to examine individual operators or combinations of operators. The ACW has no comment on the choice of operators.

*Question 2. Do you agree with our approach to classifying different types of networks and services? Are there better ways to define them?*

Members would like to see a more holistic approach towards network options and a consideration of varying and mixed technologies in delivering services. The ACW believes that the best way of defining networks is for them to be linked to customer service by location.

*Question 3. Do you agree with our proposal to prioritise 2G mobile coverage and broadband speeds for the first report?*

Members expressed concern that the focus was too narrow. In addition to 2G mobile coverage and broadband speeds, Members would also like to see an assessment of broadband coverage and availability prioritised. Concern was expressed that there was no reference to 3G, 4G or Wifi.

*Question 4. Do you agree with our proposed reference date for the report as a date in June 2011 and are we allowing enough time for the provision of data?*

No comment

*Question 5. How can we improve the comparability of data between different operators?*

Members believe that comparability depends on the standardised definitions which have been agreed following dialogue with industry.

### **Use of Electromagnetic Spectrum**

*Question 6. Do you agree with our approach for reporting on the use of electromagnetic spectrum?*

Members feel that this requires clarification. Will it include spectrum which isn't used; all useable spectrum; all available spectrum; defence/publicly controlled spectrum?

### **Coverage**

*Question 7. Do you agree with our approach to measuring coverage?*

Members feel that this needs to be more clearly defined. It is possible that as a result of asking an operator to provide information on infrastructure, a theoretical assessment of the UK's communications infrastructure will be the outcome rather than an actual assessment of coverage. There is a concern that actual service levels do not match operators' advertised service levels. Any analysis should also reflect "on the move" deficiencies in Wales on major trunk roads such as the main North-South road link (A470).

*Question 8. How do you think we should establish an appropriate level of granularity and the right technical assumptions to make the data useful?*

The granularity should be established in relation to the location types defined in our response to Question 1, and in relation to the cost implications of the level of granularity.

### **Infrastructure Sharing**

*Question 9. Do you agree our proposed approach will enable us to report adequately on arrangements for infrastructure sharing? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?*

Members would like to see an emphasis on services rather than specific technologies.

Furthermore, Members feel that Ofcom's approach to infrastructure sharing does not reflect the physical realities of the UK's communications infrastructure. Ofcom's approach excludes shared buildings, cables, databases, software, hardware, earth stations and satellites etc.

Members feel that the only way in which Ofcom can assess the actual extent of infrastructure sharing is to compare all the operators' infrastructure. Members appreciate that this would be a vast and costly undertaking, creating an additional regulatory burden on operators. Therefore, Members suggest that boundaries are set in relation to infrastructure which relate to customer services and locations in a proportionate manner.

### **Wholesale Network Access**

*Question 10. Do you agree our proposed approach will enable us to report adequately on the provision of wholesale network access? Are there reasons why network operators would be unable to provide us with the data we have proposed to collect?*

Members would like to see the proposed approach defined more clearly to identify the availability of wholesale network access for specific types of service and location. The proposed approach should also highlight the extent of reciprocity amongst all operators as a measure of competition, by type of customer service.

### **Capacity**

*Question 11. How do you currently measure the capacity of the network?*

Members believe that this question can only be answered if Ofcom specifies the types of customer service outlined in our response to question 1; and if Ofcom defines the technical character at the point of customer interface. Members believe that Ofcom must define the customer, service, time and location in order to adequately measure the capacity of a network.

Furthermore, Members would like to ask Ofcom whether the term capacity includes a consideration of the variability of demand and resupply, and spare capacity to meet demand. Members would like to see the capacity defined – never used, peak, capacity relative to infrastructure, lead time, variability of demand or just capacity for new customers?

### **Plans for the Infrastructure Report**

*Question 12. Do you agree that we should define specific metrics for different types of networks?*

Yes and for specific services.

### **Availability**

*Question 13. Do you agree with the proposed approach of gathering specific reports of outages above a certain threshold, and how do you think such thresholds should be set?*

Yes. Thresholds should be set in relation to customer numbers, specific customer services, differentiated by customer type. Members believe that emergency 999 should be treated in isolation.

*Question 14. For smaller outages, which statistical data do you think it is valuable to gather?*

Members believe that this is dependent on customer type. One Member suggested that minor outages should cover loss of a service for 3 calendar days.

*Question 15. Is a three-month reporting period sufficient to assess availability performance?*

No comment

### **Resilience**

*Question 16. Do you agree with our approach to reporting resilience and emergency planning and the list of data we would ideally collect from CPs?*

*Question 17. Do you already provide information to other organisations and government agencies around resilience issues? If so, what are they?*

*Question 18. Do you agree that there are additional networks and services which are of sufficient importance to include in the report? If so, what are they?*

Members are concerned of the implications relating to national security and commercial confidentiality arising from the collection and publication of this data.

### **International Comparisons**

Ofcom Advisory Committee for Wales:

Response to Ofcom Consultations: The UK Communications Infrastructure Report

*Question 19. Are there other sources of international data which we should consider? Are we focusing on the right networks and metrics? In particular, have we got the right metric for commenting on next-generation access deployments?*

No comment