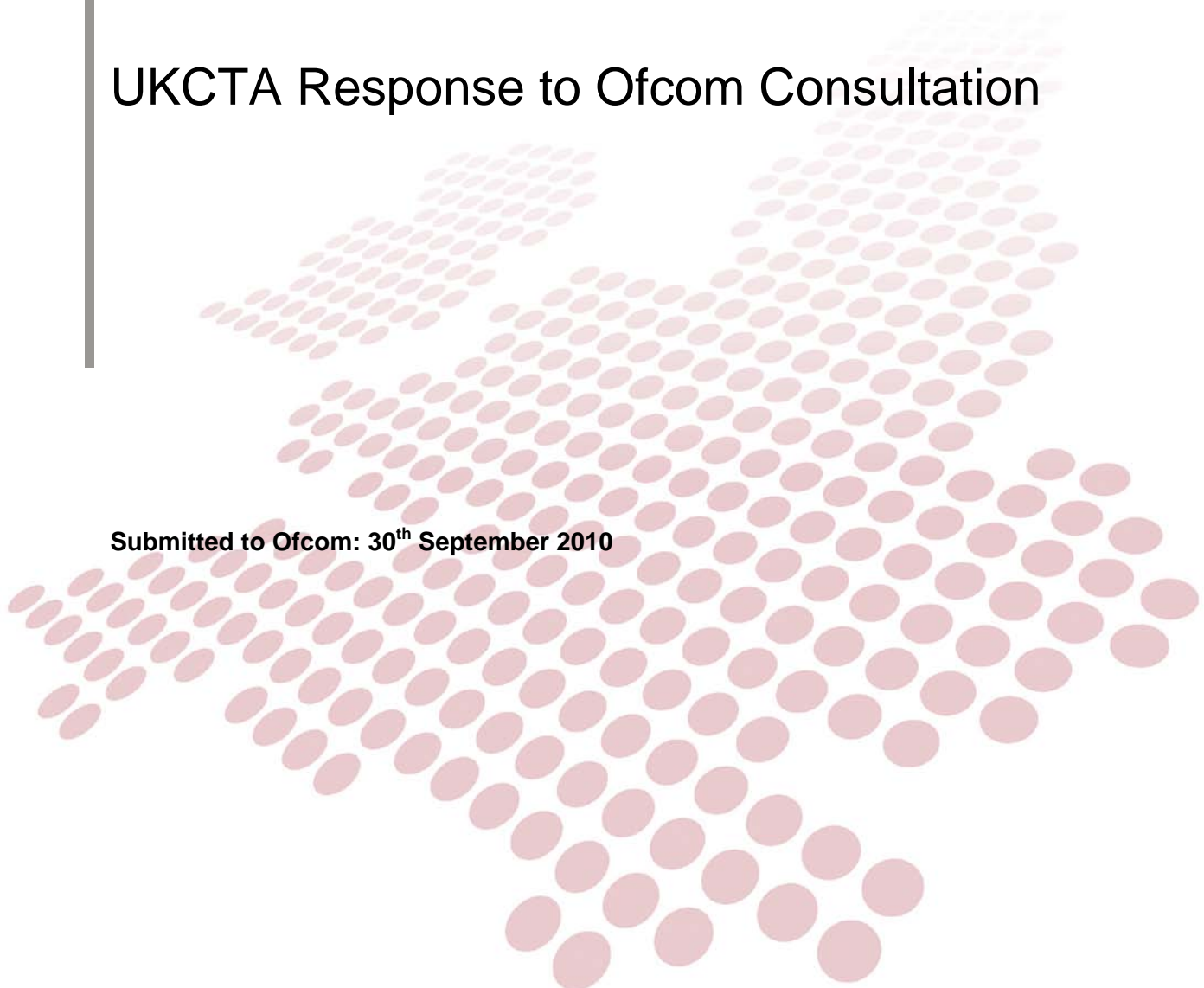# The UK Communications Infrastructure Report

UKCTA Response to Ofcom Consultation

Submitted to Ofcom: 30th September 2010

UKCTA is a trade association promoting the interests of competitive fixed-line telecommunications companies competing against BT, as well as each other, in the residential and business markets. Its role is to develop and promote the interests of its members to Ofcom and the Government. Details of membership of UKCTA can be found at www.ukcta.com.

UKCTA welcomes the opportunity respond to Ofcom's consultation setting out the proposed approach to its new duty to produce a regular report on the UK's communications infrastructure. The views expressed by UKCTA in this response do not reflect the views of Scottish and Southern Energy plc. SSE will be submitting its own response to the consultation.

As Ofcom points out in the consultation document, the Digital Economy Act does lay down a fairly wide range of reporting dimensions including coverage, availability, capacity, sharing and wholesale arrangements, and emergency preparedness. We appreciate that Ofcom is considering the potential resource burden on industry in providing the necessary data to support the production of the report.

Nonetheless, UKCTA has an overriding concern that the report will ultimately serve a very limited, if any, purpose for government policy-making in telecommunications. Whilst we appreciate that Ofcom has a statutory duty to produce the infrastructure report, UKCTA believes Ofcom should carry out this piece of work in a realistic manner rather than trying to "gold-plate" the fulfilment of its statutory duties. It would be much better to limit the scope of the first report as much as possible and then expand the second one if indeed it is shown to be meaningful and have a measurable value.

At the very least, we are concerned that Ofcom should ensure that the collection of the data is proportionate and the minimum necessary to achieve the objective of producing the report. Ofcom needs to ensure that it makes the best available use of other data sources such as the information it already receives from operators on a quarterly basis and that which it gathers through the various market reviews and other regulatory projects (e.g. broadband speed code of practice).

Finally, Ofcom also needs to ensure that providers are given reasonable timescales to collect the requested data and that the collection exercise is carefully coordinated with any other formal information requests from Ofcom in other policy areas. For instance, Ofcom has suggested that large amounts of data may have to be provided within a week in June 2011. Such a timescale would be unrealistic and therefore practically unachievable. UKCTA would recommend that Ofcom stagger the information requests over a period of several months to ensure that providers are reasonably able to collect and quality-check the data before submission.