HELEN WHATELY MP
Member of Parliament for Faversham and Mid Kent

HOUSE OF COMMONS
LONDON SW1A 0AA

Broadband USO Consultation
Telecoms Directorate
Department for Culture, Media & Sport
100 Parliament Street
London SW1A 2BQ

Sent by email to broadbandusoconsultation2017@culture.gov.uk

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Dear Sir or Madam,

I welcome this consultation on the universal service obligation (USO) for broadband. The Government has made bold and ambitious moves to bring superfast broadband to areas which previously had no connectivity. In my own constituency of Faversham and Mid Kent, which is 94% countryside, we have seen more than four thousand premises connected to broadband since 2015.

However, there is still a long way to go before all my constituents have access to this essential service. This is why the USO is vital: so that every home and every business can access high speed broadband by 2020.

Please find below my response to the consultation. I have responded only to the questions where my comments will be most useful.

Question 4

I welcome this high cost threshold of £3,400. The consultation documents note that this threshold will cover 99.8% of premises, leaving only 60,000 unserved. However, there are not data to indicate whether this threshold will actually result in a small number of rural constituencies with a large number of premises without access. I am concerned that very rural areas that I represent, such as the North Downs, could be left without broadband as the cost of connecting these premises may be higher than the proposed threshold.

The cost threshold should be set at an amount which makes it a rarity not to have access to broadband, even in rural areas.

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If you would like to find out more about what I am doing in Faversham and Mid Kent, please do sign up to my newsletter on my website.

All personal information will be treated as confidential, but the MP may allow access to it by authorised staff, and may pass it on to official agencies where it will help your case. The MP may contact you from time to time to keep you informed. Please let her know if you have any problems with these arrangements.

Question 5

Constituents often tell me that although they are advertised fast broadband speeds, in practice they are unable to get them in their properties. My concern is that the proposed eligibility criteria will leave these premises without a connection above the USO level. I would welcome more clarity on how it will be determined whether premises have access to a USO connection to make sure that coverage is truly universal. I agree with the consultation's proposal that no premises should be ineligible for a USO connection.

Question 8

I agree with the benefits of the USO as set out in the Impact Assessment. Of particular importance in my constituency is participation in the labour force and teleworker productivity. As my constituency is largely rural, many people live far from an economic centre, which threatens their ability to take up work if they are disabled.

In the changing world of work, many people choose to work remotely, even if only a few days a month. Indeed, two of my caseworkers work from home. However, productivity is put at risk when connections are patchy and unreliable. I am therefore pleased to see teleworker productivity recognized as a benefit.

I would also add that reliable broadband access is critical to agriculture. Farmers are required to do a significant volume of paperwork online, but usually work in rural areas poorly served by broadband.

Questions 9 & 10

Having an effective system to aggregate demand for broadband is vital to make sure that connections are taken up and delivered. Premises may only be able to get connections under the threshold if there is sufficient demand in that area, so I see this as an issue fundamental to the entire scheme.

I am concerned that there is not enough detail in the consultation on what systems could be implemented to make sure that aggregation works best for a diverse range of consumers. A dedicated consultation on demand aggregation would be very useful to provide the research and ideas on how to make aggregation effective and efficient.

Consequently, the Government should definitely provide guidance to Ofcom on demand aggregation so that a significant number of consumers can truly benefit from the USO.

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Question 11

Uniform pricing for broadband connection should form part of the USO so that rural users are not hit with prohibitive costs for broadband connections, which will disproportionately hit those in rural areas like my constituents.

I am concerned that a social tariff will not be made a requirement for the universal service provider. Broadband is an essential service, no matter one's income. It is increasingly replacing the telephone as the main means of communications, so it seems the wrong way round that reduced tariffs are provided for telephony but not for broadband.

Question 14

Robust monitoring arrangements are critical to the success of an extensive rollout of broadband. An annual report from Ofcom including the breakdown of USO take-up by type of premises, geographic profile and connectivity trends, as proposed, should be the bare minimum of monitoring. Formal reviews of the USO should be specified and periodic: at least once every five years.

A review of the technical specification should also be regular and specific, about once every five years. I would also welcome an early review of the technical specification as the implementation of the USO is not until 2020, by which time broadband use may look very different to today.

I am aware of the offer from BT for a voluntary roll out of broadband. I am concerned that this would weaken the current plans. I would like to see the Government press ahead with the USO, especially making sure that the USO is guaranteed by legislation.

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