

# Broadway partners SSP response

To whom it may concern:

First, thank you for the opportunity to respond to this consultation. Broadway is a wireless ISP with ambition to create an alternative digital infrastructure in rural areas, and we appreciate the opportunity to respond to the SSP which goes to the heart of our business model and ambition.

Second, in answer to your first question: yes, I agree with the Government's strategic priorities, with one or two comments in order.

1. We welcome the shift in language (Executive Summary and para 11 and elsewhere) from 'full fibre' to 'gigabit capable' - while the intention may have been good, the earlier sole obsession with 'full fibre' has had a dampening effect on communities' readiness to commit to any solution other than fibre. Our own recent deployment of a 60GHz 'mesh' network in Llandewi Rhydderch in Monmouthshire, as part of our 5GRIT participation, delivering ultrafast service within a month, is testament to the capability of advanced wireless technologies. Balance is everything, and mixed fibre-and-wireless deployments, whether in the backhaul or access networks, is in our view the right balance.

2. We welcome the promotion of national roaming (31) as a potential remedy for the mobile operators' failure to invest in rural coverage.

3. We welcome the continued work on Barrier Busting (13), on opening up Openreach's fibre and duct networks (15-19), and other initiatives to level the playing field between the rurally dominant BT and aspiring and innovative alternative carriers.

4. In that regard, we are concerned about the risk that the broadband USO (23) has the effect of strengthening BT's de facto monopoly in rural areas. Broadway applied to be the Designated Provider of the USO in both Scotland and Wales, and was turned down by Ofcom on grounds that we considered to be spurious but were not prepared to contest. With no competitor to BT, there is a serious risk that BT uses the USO to stifle innovation and investment in rural areas, and we would urge DCMS to instruct Ofcom to have particular regard to this risk.

5. With reference to the 'outside in' approach (24), it is not at all clear as to how precisely the Government will 'support the deployment of networks in these hard to reach areas, starting at the same time as the market deploys to commercially viable areas'. Do you have specific policy tools in mind? Our concern is that, with BT likely to be the Designated Provider of USO, it will use that incumbency to stifle other investment.

6. We welcome the Government's support of the development of 5G technologies and ecosystems under the Test-bed programmes (33).

7. We welcome the release of new spectrum, on a licenced, unlicenced and shared basis (35-40). While we welcome Ofcom's overall embrace of the principle of greater access to unused spectrum, we are concerned about the 'permissioned' basis of this – this feels like a Northern Ireland backstop-type arrangement. We are also concerned that Ofcom's proposal for spectrum sharing is based more on administrative process than a dynamic one – which seems to be a missed opportunity given Ofcom's and industry's generally favourable experience of the 'sharing' aspect of TV WhiteSpace. We welcome the Government's proposal regarding 'use it or lose it' provisions (38).

8. We welcome the proposal (39) to require Ofcom to report on the utilization of spectrum on a geographic basis. A practical suggestion to support this is that we understand that it is possible to determine which mobile operators have equipment on every mobile mast, that this information is fragmented, and that this information could be made into a publicly accessible database: this would greatly assist the alternative carriers to determine where to target their spectrum-sharing requests.

Great job DCMS, keep it up!

Kind regards,

Michael