

From: Matt Chilcott
To: "newbuildconnectivity2018@culture.gov.uk"
Date: Thu Dec 20 2018 09:20:00 GMT-0000 (GMT)
Subject: New Building Developments - Delivering Gigabit capable connections consultation

Please find below responses to the New Building Developments - Delivering Gigabit capable connections consultation submitted on behalf of Net Support UK LTD.

Do you have any further evidence on the state of New Build Development connectivity in the UK?

We are aware that housing developments in South Wales have regularly been built in not-spots without full fibre considerations. This is changing for larger developments however smaller housing developments still do not appear to have caught up. Developers themselves continue to install copper & Cat 5 cabling anticipating connectivity to BT and are not enthusiastic to engage with other partners when construction has started on their sites. Most new builds do not cater for retro-fitting / upgrades of infrastructure.

Do you have any information or evidence to suggest that the costs developers would incur under the proposed policy would prevent homes being built?

We anticipate minor negligible impact.

We propose that developers would be obliged to provide a simple connectivity plan for their developments to LAs. This plan would demonstrate that developers had consulted with at least two network providers to provide gigabit-capable networks and inform LAs when a site is connected. Do you have any comments on this proposal for a connectivity plan?

Highly recommend this proposal especially the need for more than one provider. Also the plan should allow for retro-fits and upgrades.

Do you agree with the assumption that deploying the necessary infrastructure to deliver gigabit-capable networks is best achieved when the site is being built?

Yes physical assets such as ducts when the site is being built together with internal fibre. However, external fibre should be blown after construction is finished.

(b) What technical specifications should the physical infrastructure (ducts etc) have?

A minimum of 2 independent sub-ducts to each property connecting back to a single point of presence on the site (suggest a maximum of 2).

(c) Do you agree that developers should deploy, and pay for, the necessary infrastructure from the in-building connections to the boundary edge of the development?

Building Developers should be responsible for all constructions costs but fibre and duct costs should be born by the ISP. Normally we would suggest that the Telecoms Operator pay for the install costs. If the Developer covers the costs to the boundary edge then this would need to be an open access network that any Telecoms provider could utilise.

(a) Do you agree that developers should have to engage with at least two network operators who can provide gigabit-capable connections to the development?

Yes and we argue that the 2 connectivity providers should both have no connection or interest to the Developer company.

(b) What further measures could we consider to promote the availability of networks from multiple providers at an early stage to minimise costs and disruption?

This should be an element of the connectivity plan.

Taking £3,000 as a suggested aggregated cost cap per premise, how should costs be divided between developer and operator?

It depends on who ever pays for the duct and fibre asset ownership. They should receive 80% of the cost.

What information and evidence can you provide to help refine the 'in scope sites' policy design choice - aggregated cost cap or number of premises?

We believe that aggregated cost cap is the way forward.

(a) Do you agree that developers should have the overall responsibility to ensure Gigabit connectivity for their developments (allowing for the fact that developers can oblige operators to connect using the 'duty to connect' provision).

Yes

(b) How would this policy affect small housebuilders

Houses should be built in locations where they can have gigabit capable connectivity or alternatively apply for an exception. When selling the property this should be identified to end consumers.

Do you have any comments on the proposed legislative approach? Do you have an alternative solution that would deliver gigabit-capable connections to NBDs?

The proposed connectivity plans should enhance the roll out of gigabit capable in rural areas in particular. It could be mandated for LAs to inform existing communities near to the development sites that they could contact the Telecoms operators to seek new connections for existing properties as well the new ones. Joined up thinking to benefit communities could be easily achieved by this approach.

Kind regards, Matt
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