![UKspace - The Space Trade Association logo]

UKspace input to the Department of Culture, Media and Sport – "A NEW BROADBAND UNIVERSAL SERVICE OBLIGATION CONSULTATION"

This response to the Department of Culture, Media and Sport (DCMS) – "A New Broadband Universal Service Obligation Consultation" is submitted on behalf of UKspace

About UKspace:

UKspace is the trade association of the UK space industry and has been its leading voice for over 30 years. It represents the interests of industry with: the UK government, parliament and national and international stakeholders.

Our Role:
- Acting as the leading voice of the UK space industry;
- Growing the UK's share of the global space market, by promoting the best commercial, political and public environment for the UK space industry;
- Promoting greater awareness in government, the media, the public and other key stakeholders of the wide-ranging benefits from one of the UK's most innovative, high skilled and value-adding sectors;
- Acting as the focal point for any organisation commercially involved in space systems and related services in the UK;
- Providing the primary forum for industry dialogue with the UK government and with other national and international stakeholders; and
- Supporting the space SME community

For more about UKspace please see: http://www.ukspace.org/

Introduction

Following years of investment in broadband infrastructure, many parts of the UK are still to fully take up the benefit from good coverage, speed and price packages for broadband delivery. Satellite delivered broadband has a significant role to play in providing broadband services that will help the UK meet its Universal Service Obligation (USO) and not just in the last 5% (circa 1 million households).

UK satellite operators Avanti Communications and Inmarsat (together with other European Satellite Operators) have already made significant (multiple billion dollar) investments to

provide wholesale and retail satellite delivered broadband services to the UK either directly or through networks of distribution partners.

This satellite coverage is ubiquitous and reaches almost every premise across the UK.

Ukspace believe that the DCMS should focus more on providing the right quality of experience to consumers at a price they are willing to pay, than delivering superfast services that, in rural areas, fewer want or can afford. DCMS should consider how future policy and the regulatory environment can enable each alternative technology to the incumbent fibre network to be included and to play to their relative strengths, in order to connect everyone in the UK.

The speed of the USO should be based relative to the reality of market supply conditions of broadband services to the worst case areas in the UK at the time of setting the limit. For example, it would not be appropriate to baseline the USO on the speed of say fibre connectivity if these services were not currently available in the areas with the least connectivity. The USO should be baselined on the speed of the technologies that can reliably supply these regions at the time of the review. The reality is that for the majority of these remote and rural locations today is that technology is satellite delivered broadband.

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Whilst satellite delivered broadband can deliver peak download services of over 20 Mbps, a key role it can play is in fully enabling a Universal Service Obligation service at a more sensible 5 to 10 Mbps to the unconnected, maximising the numbers addressable with the available capacity.

In consideration of the above UKspace therefore recommends that the USO should today be set at a speed of between 5 to 10 Mbps. We consider this target to be achievable and should be the baseline requirement.

1. Consultation Questions and Response:

Q1: Do you have any concerns about the approach that has been set out here?

1.1.   UKspace are concerned that DCMS and/or Ofcom must be seen to set the speed of the USO speed relative to the reality of market supply conditions of broadband services to the worst case areas in the UK at the time of setting the limit.

1.2.   It would not be appropriate to baseline the USO on the speed of say fibre connectivity if these services are not currently reliable and widely available in the areas with the least connectivity.

1.3.   The USO should therefore be baselined on the speed of the technologies that can reliably supply these worst-case regions at the time of the review. That is for the majority of remote and rural locations today that technology is satellite delivered broadband.

1.4.   Whilst satellite delivered broadband can deliver download services of over 20 Mbps the greatest role it can play is in fully enabling a Universal Service Obligation service at 5 to 10 Mbps to the unconnected.

1.5.   UKspace respectfully therefore suggests that the USO should today be set at a speed of 5 to 10 Mbps.

Q2: We do not propose to specify speed in primary legislation. Should speed be specified in primary or secondary legislation?

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1.6.   UKspace has no express view as to whether or not the USO should be set in primary or secondary legislation

Q3: In terms of giving the Secretary of State a power to direct Ofcom to review the USO, should Government have a continuing role in the USO, or should this be a matter for Ofcom?

1.7.   Ukspace has no express view as to whether or not the Secretary of State should be given the power to direct Ofcom to review the USO, or should Government have a continuing role in the USO, or should this be a matter for Ofcom.

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UKspace: promoting space jointly with ADS and techUK

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