

Dear Sir/Madam,

I would like to point out the following;

For many years, small local wireless broadband operators have provided a service to rural Ireland in the absence of services of the larger operators who deemed it un-economical to provide such service in these locations.

These operators such as ourselves and the services we provide have gone completely unrecognised by both Comreg and DCENR.

Small broadband providers have for many years operated on limited budgets while still managing to provide manageable speeds to our clients.

The obstacles we face as an operator in Kerry is one of the main reasons why some areas continue to have no access to wireless broadband.

Other obstacles such as planning issues in relation to the local authority not allowing for a 5Mtr wooden pole to be erected because we are a private company while still allowing Eircom erect poles wherever they so choose can also hamper progress.

Another obstacle is the cost of fibre transit from Dublin to Kerry.

For example, we buy wholesale internet backhaul in Dublin at a cost.

We then contract e-net, who are tasked by the state to run the state fibre infrastructure, to deliver the bandwidth to Kerry.

There is a 700% increase in price by the time it reaches Kerry.

This is an unfair advantage to operators who provide services close to the main cities.

Given the ESB model, a unit of electricity is the same in Dublin as it is in Kerry.

Backhaul should be no different. After all, it is just a beam of light through a fibre cable.

The profiteering of state infrastructure by a private company tasked with running the infrastructure is something that is greatly hampering the rural service provided by rural operators. It is supposed to be an equal open access network but is far from.

Our submissions are as follows:

1. Allow local rural operators to have the same planning exemption in relation to the erection of small poles such as those afforded to Eircom
2. Look at the running of the state fibre infrastructure and allow true equal open access to all operators no matter where they reside.
3. Support local operators in their rollout of new technology rather than putting obstacles in their way.
4. Introduce a financial grant system for rural operators looking at connecting rural areas to high speed wireless broadband.

Kind Regards

Paul Dolan
Managing Director
Kerry Broadband Ltd