The Right Honourable Jeremy Hunt MP
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2nd April 2011

Dear Mr Hunt,

Broadband in Ewhurst, Waverley and the UK

I write as someone who lives in your constituency and an observer of the broadband agenda. I am a chartered engineer having until last September worked for SEEDA and therefore I understand how important good quality broadband is to economic development. I now work as an independent telecommunications consultant and have recently worked with Waverley Borough Council to help them to understand the options available to improve broadband, especially in rural areas.

Your policy to bring fibre hubs to each rural community and to allow the community to decide how they connect themselves to the national fibre network is admirable. However, I am writing to make you aware of what is going on in your own backyard, as this could jeopardise the policy nationally.

The broadband infrastructure in parts of Ewhurst is very poor with some properties receiving no service and many others sub-standard. This is because the local telephone lines are very long, of extremely poor quality and poorly maintained by BT. They are an example of the 2% of premises in the South East with no service and at least 15% with less than 2Mb/s (SEEDA research). A community group in Ewhurst, using their own time and money, put together an innovative project to provide a Fibre to the Premises solution to replace the worst telephone lines. This attracted a written offer of EU RDPE funding from SEEDA that has subsequently been hi- jacked by BT, who have manipulated the public sector by the use of Non Disclosure Agreements with a promise of deployment of their solution. This is after BT had refused over many years to work with the local community to reroute the local telephone lines and stated in writing that they had no plans to invest in improvement of the infrastructure for broadband. When the Ewhurst group went out to tender, the solution they chose was that offered by Vtesse. BT did not even bother to submit a compliant tender.

SEEDA are now unable to reinstate their grant offer because of a continuous delaying tactic by BT, who initially promised to confirm their intentions for Ewhurst by an announcement in February 2011, then mid March, then end of March and have extended this a further two weeks from now until sometime in mid April 2011. My previous experience of this tactic relating to other broadband projects when I was with SEEDA is that there will be a long delay and that ultimately BT will not provide a solution for Ewhurst unless a subsidy is provided.

Despite DEFRA, and in your department BDUK, taking the view that this is a local issue, I believe that there is a bigger national impact. BT's tactics are already leading to a realisation by local communities that the "Big Society" policy in the case of broadband is not working and communities are therefore

loosing enthusiasm. Other infrastructure providers, who are already trying to operate on an uneven playing field, are unlikely to bid if BT continues to obstruct in this way. Further, the BT solution of Fibre to the Cabinet, once deployed is not expandable to Fibre to the Home for technical and commercial reasons. Therefore, taking Ewhurst as an example, such a BT solution will not improve the service sufficiently for the outlying properties, especially as BT do not include any Universal Service Obligation for broadband nor have any replacement or refurbishment strategy of their ageing local network infrastructure.

BT treatment of projects such as Ewhurst is killing off the potential competition, killing off innovative solutions and this will put the nation even further behind in the broadband league table.

I hope that this makes some sense for you and that you appreciate that I am writing with a passion derived from the frustrations of almost 10 years of watching the lost opportunities for the development of improved broadband infrastructure in the UK, much of which relates to the way the industry is organised and regulated.

I am sure that anything that you could do to free up the Ewhurst situation would at least demonstrate to local communities across the UK that the "Big Society" is for real and will provide an incentive to commercial operators to bid into the larger scale projects being developed by local authorities in collaboration with BDUK.

Yours sincerely,



David C Cooper CEng MIET

Jeremy Hunt MP

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David C. Cooper
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03 May 2011

Dear Mr. Cooper,

Thank you for your email about broadband in Ewhurst which I read with interest. I was concerned to hear about your experience of BT although I am pleased that you support our goal for the national framework.

We are currently conducting a broadband pilot based around the Eden Valley which seems to run along the lines originally intended by the group in Ewhurst. I would be interest in meeting with you or other members of this group to discuss the best way to provide a solution for Ewhurst or to examine any other options for funding. If you believe that this would be useful then please contact my office in Hindhead on 01428 609416 to arrange a surgery meeting.

Yours sincerely,

Jeremy Hunt

Rt Hon Jeremy Hunt MP
Member of Parliament for South West Surrey
Secretary of State for Culture, Media and Sport

David Cooper

From: David Cooper [david@cooperfarncombe.freeserve.co.uk]
Sent: 01 June 2011 10:08
To: 'huntj@parliament.uk'
Cc: 'Walter G. M. Willcox'
Subject: Ewhurst Broadband
Attachments: Letter to Jeremy Hunt - updated.pdf; For Jeremy Hunt.pdf

Dear Mr Hunt,

In anticipation of meeting with you at your Hindhead surgery on Friday 3rd June, I enclose a copy of my original letter updated with the current situation.

I also enclose a separate document from Walter Willcox who will be attending the meeting with me and is the main mover behind the project to improve broadband in Ewhurst.

We look forward to meeting on Friday.

Kind Regards

David Cooper

Ewhurst update:

BT (Openreach) published information dated the 6th April 2011 that puts FTTC for Ewhurst as some time in 2012. This announcement was in a new format to previous phased announcements with Ewhurst included on a new format list titled, "Future Exchanges (firmer dates to be provided nearer the time)". ESHB had been pushing for March 2012 and have currently accepted BT's announcement in good faith.

However, confidence that BT can deliver is already decreasing, given the slip to other exchange areas, observations of slow progress in Guildford (believed to be in phase 5b now due in June 2011, was March 2011) and the fact that Ewhurst is programmed for the last phase in the last announced programme, believed to be phase 7b.

In any case, regardless of timescales, BT's proposed FTTC solution will not significantly improve the Ewhurst outliers, who currently have no service, where long poor quality lines connect them back to the cabinets. This is of great concern as BT (Openreach) has said that once they have invested in FTTC they will not invest to improve or replace with fibre the cabinet to premise lines. The solution proposed by Vtesse is designed both from a technical and commercial aspect to be able to upgrade cabinet to premise lines as necessary.

Impact on policy:

BT are finding that take-up of their Superfast Broadband service is low. This is not surprising as they have decided to compete with Virgin Media and not to invest in areas of pent-up demand on the edge of towns and in rural areas that have always been poorly served. Where BT do invest they do not enable every green cabinet in an exchange area nor do they provide full capacity for every line in each cabinet seemingly ranging from 25% to 65% of lines. This tactic blocks opportunities for other commercial operators. BT's FTTC and GPON FTTP solutions are limited stop-gap designs that will require expensive replacement with point-to-point FTTP within 10 years.

With other broadband infrastructure companies finding it difficult to make a business case given BT Openreach's wholesale prices and restrictive practices, BT is likely to secure significant public money to bring their FTTC solution to rural areas. Their solution is not a flexible fibre hub as described by the policy that offers a community any choice in how they wish the final leg to be delivered and further, will block progress to faster solutions for at least 10 years. This scenario could see the benefit of public money being short-lived by just reinforcing BT's flawed business plan rather than provide a future-proof infrastructure to the benefit of businesses and residents in rural areas.

Options for Ewhurst:

Wait for BT, with the inevitable delays and poor solution.

Reinstate SEEDA funding, or provide other funding, for the Vtesse solution unless BT can provide a detailed programme of their intentions immediately including the provision of an adequate upgradable solution.

Seek other alternatives to ensure a solution is available this year.

Points for Jeremy Hunt

Public sector (BDUK & DEFRA) & Government attempt to hide the real broadband situation and claimed Ewhurst was "only a local issue" where it is actually of vital national importance to upgrade the twisted pair network to fibre (FTTP). The Vtesse Networks Ewhurst project included the fibre backbone to initiate fibre deployment which is vital in an area with long poorly performing (and some non-existent) broadband services. Fibre also can provide full symmetric services rather than the existing asymmetric services.

BT's disgraceful tactics might provide their standard FTTC (but delayed) solution but without any universal service obligation for broadband. BT's FTTC solution using unshielded twisted pair cable in not fit for medium term purpose yet BT with Government / Public Service collusion / acquiescence are taking a monumental gamble that the UK will accept waiting for their 10 year payback on substandard services compared with Virgin's urban solution. (7% Cardiff BT take-up) The effort used in line fault investigations and adjustments must be costing both BT and the Nation significant sums. More national investment will then required for Fibre To The Premises (FTTP). Eventually BT's network must be replaced with fibre so why subsidise their old solution which requires at least 10 years to cover the only parftial, expensive inferior FTTC solution costs?

BT's FTTC solution doesn't cover those lines connected directly to the exchange nor every cabinet in an exchange area nor every line within a cabinet (Guildford seems to be about 80% coverage and Virgin media also has coverage gaps). FTTC isn't suitable for poorly performing lines or ones over say 1 km from the cabinet. We have some lines nearly 4 km from the cabinet.

BT is an over-bloated dysfunctional and expensive operation. They are protected by Ofcom and their *separate* Openreach organisation hinders others significantly. BT's connection regulations add to installation expense and favour their own FTTC which do not have the same regulations applied. BT's implementation designs both of FTTC with SMPF and FTTP with PON perpetuate their monopoly and prevent others from providing alternative cheaper solutions. E.g £127 to connect every FTTC pair within a cabinet.

Given BT's disreputable action in Ewhurst, can Government allocate funds immediately to install FTTP here as a pilot scheme? This would demonstrate that big society can achieve much.

Virgin Media's fibre & coaxial cables is much more suitable and includes ducting to each house allowing for future FTTP, but their coverage even in urban areas is not complete and is non-existent in rural areas. Better to subsidise Virgin rather than BT's ageing twisted pair network.

BDUK's initiative to encourage LEPs and Councils to bid for broadband funds does not address the need for a national universal access nor should it continue to subsidise BT's ageing network instead of a new fibre network.

A single electricity, gas and water network is a much better solution than the current communications "rail crash" situation. Divorce BT Openreach entirely from BT and perhaps amalgamate with Virgin Media's distribution network.

Jeremy Hunt MP

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Mr David Cooper & Mr Walter Wilcox
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08 June 2011

Dear David and Walter,

Thank you for taking the time to come and see me at my recent surgery in Hindhead. It was a pleasure to meet both of you.

I was very interested to listen to your views about current broadband speeds in Ewhurst, and it was fascinating to look through your photos of the different broadband cabinets that are currently in use. As I outlined in our discussion, I am extremely aware of the importance for all communities to have access to broadband and how inadequate current provision is. Particularly in rural areas, broadband is going to be absolutely vital in driving the creation of the small businesses that will be so important to maintain employment growth in our country.

I fully agree that many rural and hard to reach areas are currently missing out, because of a lack of fibre optics to the cabinet as well as to the home. My department has calculated that to install fibre optics to the home across the UK will cost around £29 billion. Unfortunately the government cannot afford this in the current economic climate. However as I outlined, the Government announced in December its ambition for a 'digital hub' in every community in the UK, as part of an £830 million strategy to make sure we have the best broadband network in Europe by 2015. To access this fund local authorities must provide 2 megabyte broadband speeds to 100 percent of homes and superfast 20 megabyte speeds to 20 percent of homes in their area. This strategy will include cutting the costs of access to infrastructure and increasing shared access by working with house builders to make new homes broadband ready, and cutting the costs of laying cable by clarifying the rules on street-works.

Furthermore I am currently in discussion with the Treasury about the possibility of introducing a pilot scheme in one UK city to deliver fibre

optics to 100 per cent of homes. This should offer superfast broadband for mobile devices such as smart phones and tablets. I hope the pilot exercise will help establish the commercial costs and challenges involved in rolling out super-fast broadband across the UK.

Thank you again for sharing your obvious expertise in this area with me. It was a pleasure to listen to your comments on how the government should move forward. I am fully committed to, and actively working towards rolling out super-fast broadband across the country and I hope in the next months and years you will see an improvement to the service in Ewhurst, as well as across the UK.

I hope that our meeting has reassured you of the Government's commitment to having the best broadband network in Europe by 2015.

If there is anything further I can help you with please do not hesitate to get in touch.

Yours sincerely,

Jeremy

Rt Hon Jeremy Hunt MP
Member of Parliament for South West Surrey
Secretary of State for Culture, Media, Olympics and Sport

Summary of points made at meeting on 3rd June 2011 with Jeremy Hunt
Broadband in Ewhurst

1. The Ewhurst project has demonstrated the difficulties in targeting public funding when the public sector and local communities do not know whether BT plan to enable an area. This is made worse when BT contradict their own written reply and announce their plans only after the public sector, local "Big Society" communities and alternative broadband providers have expended significant time and money making alternative arrangements.

2. The Ewhurst scenario is not unique, BT having stepped in when under threat from alternative broadband schemes in numerous well-documented cases. Just two examples are: Erbistock, http://www.bbc.co.uk/news/uk-wales-11287904 and Hambleden (announced in local paper after Hambleden negotiated wireless broadband provision from Village Networks, http://www.henleystandard.co.uk/news/news.php?id=691823.

3. BT may make their plans known to the public sector under Non-Disclosure Agreements, but this does not help local communities to understand the effect on their service.

4. In BT exchange areas where BT are deploying fibre, for commercial reasons they do not include all cabinets. Further, for the cabinets that are included, they do not install equipment or cabling to enable all telephone lines, typically only between 25% and 65%.

5. The exchanges left out are those in rural areas and the cabinets left out are those on the edges of towns with relatively small numbers of subscribers, usually already having a poor broadband service.

6. The effect of this is to fragment the areas of non-superfast broadband that BT say are not commercially viable without subsidy. BT has a major advantage in the urban areas where they have partially deployed Fibre-to-the-Cabinet (FTTC), as it is unlikely to be an attractive proposition for an alternative supplier. In rural areas, there may be more competition, but in all areas, deployment by others will depend on realistic BT prices and active cooperation for the use of their infrastructure and the same cost-effective cabinet engineering requirements applied to all companies, including BT Openreach. In other words, there should be a level playing field, including equal treatment by the much-despised "fibre-tax".

7. Where it exists, the fully ducted Virgin Media network is inherently more adaptable to future expansion to Fibre-to-the Premise (FTTP) as it is high bandwidth fibre, coaxial cable and a separate telephone connection. BT twisted pair telephone connections are bandwidth limited and upgrade to include more FTTC or FTTP will need considerable investment.

8. The BT FTTC design does not allow the option for another provider to take over the complete telephone wire to the consumer's premises. This means BT retain the ability to charge rent for the telephone line, although the end user may not use the line for a telephone service. This is in conflict with the BT Openreach price list that includes both options. See http://www.guardian.co.uk/money/blog/2011/mar/26/bt-landline-rising-costs.

9. The BT FTTP solution utilises shared fibre, known as Gigabit Passive Optical Network (GPON), chosen by most incumbents, as it is cheap and inaccessible by others at the "passive" level (this means that other provides have to connect at the "active" level, very much under the control of BT). The alternative future-proof point-to-point fibre, offered by Fujitsu, has none of these disadvantages. Perhaps any future fibre city should demonstrate point-to-point fibre, as in Amsterdam http://arstechnica.com/tech-policy/news/2010/03/how-amsterdam-was-wired-for-open-access-fiber.ars.

10. BT progress (as observed in the local area) seems to be slow and for the reasons above we believe the equipment is not future-proof. These links show their underestimates of the resources required, and lack of take-up.
http://www.ispreview.co.uk/story/2011/03/11/bt-uk-frustrated-by-lack-of-superfast-fttc-broadband-uptake-in-cardiff-wales.html

    http://www.theregister.co.uk/2011/05/25/bt_fttp_trial_rollout_delayed/

    All of this points to a project that fails on specification, cost and timescale; all three key project parameters.

    The concern for Ewhurst is that having high-jacked the project, BT will not deliver within the RDPE EU regulation timescale (3 years) and even if they do, the BT FTTC product will be inadequate for those currently in not-spots.

11. Finally, it seems that a longer-term fix is required and we suggest that until a separate "Infrastructure Company" exists the conflicting interests within the BT group will inhibit progress towards "the best broadband in Europe". It is true that functional separation of Openreach from BT has helped to give consumers a good deal on first generation broadband. However, the Ofcom decision to organise BT in this way was a compromise, and perhaps the time has come to consider full separation with utility network type regulation that will ensure that the future network is a national strategic asset with proper investment.

David Cooper
Walter Willcox