

# New Broadband Universal Service Obligation consultation

Summary of responses and Government response

17 May 2016

# **Table of Contents**

Introduction	2
Summary of responses	4
Next Steps	20
Annex A: List of respondents	

### Introduction

This report sets out the Government's response to the consultation on the new broadband Universal Service Obligation (USO), which explained the Government's rationale for implementing a new broadband USO, and the proposed roadmap for taking this work forwards.

The consultation document explained that, as a first step, we want to clarify in primary legislation the Government's powers to implement a broadband USO. To do this, we proposed a new enabling power in primary legislation which would give the Secretary of State an explicit power to introduce a new broadband USO to provide functional internet access appropriate for today's needs.

The consultation document set out that we are also considering an additional measure in primary legislation which would provide the Secretary of State with a power to require Ofcom to review the USO, as appropriate, to ensure that in future it continues to reflect connectivity needs, including whether the minimum speed needs to be updated. This will ensure that people and small businesses that rely on the USO do not fall behind as demand for faster broadband connections grows.

The Secretary of State has commissioned Ofcom to undertake detailed analysis of the key factors that will help inform the design of the USO. We are asking Ofcom to report on its findings by the end of the year. Further details on this are provided later in this document in the section on next steps.

We intend that secondary legislation will then be developed setting out the scope, including specific requirements and guidance for the design of the USO. It is our intention to consult on proposals for secondary legislation once we have considered Ofcom's report, and a regulatory impact assessment will accompany that consultation. This second consultation will cover the detail of the USO, and will provide an opportunity to comment on the design of the USO and how it is to be implemented.

Once the secondary legislation is in place, Ofcom will then carry out work on the detailed design of the USO and on its regulatory implementation.

The consultation ran from 23 March 2016 until 18 April 2016, and the consultation document is available on the gov.uk website: <a href="https://www.gov.uk/government/consultations/broadband-universal-service-obligation">https://www.gov.uk/government/consultations/broadband-universal-service-obligation</a>

We sought views on the following questions:

- Q1: Do you have any concerns about the approach that has been set out here?
- Q2: We do not propose to specify speed in primary legislation. Should speed be specified 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?

We would like to thank respondents for their responses to the consultation. In all, we received 196 responses from electronic communications industry (network operators, and internet service providers), business and residential consumers, local government, Members of Parliament, and various representative organisations, all of which have been fully considered. A list of the groups and organisations who responded is provided at Annex A.

This report summarises the key issues raised and views expressed in consultation responses, some of which are directly relevant to the Government's proposals for primary legislation, and some of which will provide helpful input for the Government's second consultation on the detailed design of the broadband USO.

# **Summary of responses**

This table gives a breakdown of the number and type of responses received.

Type of Respondent	Number of Responses
Individuals	72
Local government (including county councils, district councils, parish councils, etc. and local government associations)	52
Representative bodies (including business, consumer, rural and local interest groups)	23
Businesses (excluding communications providers)	18
Communications providers	17
Members of Parliament	4
Devolved Administrations	3
Others (including think tanks, advisory bodies, etc.)	7
Total	196

### Responses to the consultation questions

The following sections describe the main points that respondents made in response to each of the three consultation questions.

# **Question 1**: Do you have any concerns about the approach that has been set out here?

The main issues that respondents raised related to the following:

- i) Regulatory / demand-led approach
- ii) Scale of ambition including minimum speed
- iii) Delivery timetable
- iv) Competition and investment impacts

### i) Regulatory / demand-led approach

It is clear from the responses received that there is considerable support for universally available, fast, affordable, broadband access. The Government's proposal to implement a USO to support delivery of broadband to the hardest to reach areas was welcomed by the majority of respondents. Many noted that people are increasingly seeing the provision of broadband to be as essential as other basic services, so that people can participate fully in society. The majority of responses recognised that there is a particular problem with broadband connectivity in hard to reach rural areas, and suggested that the lack of access is hindering productivity and growth. Other respondents also referred to the important role that the USO could play in ensuring people are not digitally excluded.

Others have argued for a regulatory intervention as there is market failure, and because commercial provision is uncertain, or will not guarantee access to a reliable broadband service. There was also a suggestion that the powers to introduce a USO should be devolved to the Devolved Administrations in Scotland, Wales and Northern Ireland so that they could design a USO appropriate to conditions in their markets.

However, some respondents, particularly those in industry, do not share the view that regulatory intervention is needed at this stage. In particular, there was support in some industry responses for a commercial solution, coupled with the removal of regulatory barriers, and supported by some public funding, to deliver broadband for the hardest to reach premises as this had been successful to date. Calls for continued public funding were made in various responses. Some respondents urged the Government not to take regulatory action prematurely, suggesting that the first regulatory step in implementing the USO of taking powers in primary legislation should be delayed until other options had been exhausted.

There is support for a demand-led approach - as opposed to a 'supply side intervention' such as a roll-out programme. Some respondents said that the demand-led approach should operate only in the very hardest to reach areas, as this would help create the most cost effective approach overall.

A number of respondents expressed concerns about the USO being a demand-led approach. The main concerns were that this would not be the most cost effective or efficient approach to improve broadband connectivity and would lead to gaps in coverage. Others were not supportive of a demand-led approach on the grounds that it places the burden on the citizen to request a connection, and that they believe it would provide no guarantee that they would receive the services that the USO aims to provide.

### ii) Scale of ambition including minimum speed

A number of respondents referred to the Government's ambition to set the USO initially at a minimum speed of 10Mbps. There were mixed views on this point.

Some made it clear that the current minimum of 2Mbps provided for under the Government's Universal Service Commitment was insufficient, and that 10Mbps would be more helpful. One response said that a broadband service of 5-10Mbps would be transformational for some rural businesses in the hardest to reach areas as it was a considerable improvement on what was currently available to them.

Others felt that the speed should be set at a higher level. One respondent suggested that the speed should be set in excess of immediate demand given the rapid pace of market change and ever increasing data demands. Of those calling for the minimum speed to be higher, there were calls for superfast broadband for all, and for everyone to have access to the same speeds regardless of location, so that people in rural areas would not be disadvantaged in comparison to those in urban areas. Some respondents called for 100Mbps upload and download speeds for all on the grounds that it would future-proof connectivity needs. No estimation of the cost of such provision was given in these responses.

At the other end of the scale, a number of respondents considered that 10Mbps would be too high a minimum threshold. Some concern was expressed that the Government should not set a USO which went beyond the minimum requirements of the Universal Service Directive. Concerns about the level at which the USO might be set were echoed by those who were concerned that if industry were required the share the cost of funding the USO this would translate into higher costs for consumers.

There were mixed views about whether everyone should be offered the same minimum speed, with some calling for those in the very hardest to reach areas to have access to a lower speed than the rest of the country.

Some responses called for businesses to be given a higher speed threshold than residential consumers, and that upload speeds should be specified in addition to download speeds. The Federation of Small Businesses (FSB) called for the explicit inclusion of small businesses in the USO and the EEF, the industry body for engineering and manufacturing employers, went further in calling for there to be a separate broadband USO for business.

Many responses said that they thought that there was a clear need for the speed minimum to be increased over time. Others thought that caution would be needed in terms of increasing speed over time, since they believed that 10Mbps would be more than sufficient for both residential and small business users for years to come.

### iii) Delivery Timetable

A large number of respondents referred to the timetable for the introduction of a broadband USO.

A number of respondents said that implementation of the USO by 2020 was not soon enough; that the proposed process for implementation was overly bureaucratic and that delivery should be accelerated.

Others indicated that the timing of when the right to request a connection under the USO should be introduced would need to be carefully considered to ensure that the Government's publicly funded superfast broadband rollout is maximised, and that it does not disrupt any planned commercial deployment. An example of this is KCOM's planned investment in ubiquitous Fibre to the Premise (FTTP) connectivity in Kingston upon Hull, which it is due to complete in 2020.

There were also calls for a timetable to be set out, with clarity in particular sought as to the legislative timetable, and when services could be requested under the USO. The consumer view expressed in the consultation responses was that greater certainty was needed on when and how improvements would be delivered.

### iv) Competition and investment impacts

Some respondents raised concerns about the impact the USO would have on competition and investment. For example, some respondents stated that the designation of Universal Service Providers would limit consumer choice and supplier opportunities, and that commercial investment in broadband deployment would be held back until the impact of the USO is known. General points were made about the limited competition in the

sector in some parts of the country, for example, where Openreach or Virgin Media is the only fixed broadband infrastructure provider, and that more should be done generally to support commercial investment in broadband infrastructure.

### **Government response**

### i) Regulatory / demand-led approach

The Government recognises the broad support for universally available, fast, affordable, broadband access, and remains of the view that this is best delivered through a demand-led USO approach.

However, the USO regulatory approach that the Government is proposing does not mean that Government has closed its mind to other means of improving digital connectivity across the UK. The Government is mindful of the need to ensure that the USO complements existing Government-funded and commercial roll-out schemes.

Superfast broadband roll-out will not stop when the Government's target of 95% superfast broadband coverage has been met at the end of 2017. The Government is committed to reinvesting funding to extend superfast broadband to as many rural homes and businesses as possible. The contracts we have put in place with Openreach mean that the more homes and businesses that sign up for superfast broadband, the more money Openreach has to return to local authorities to extend the roll out even further. So far, Openreach has confirmed more than £200 million of new investment, over and above the £1.7bn of public funding already allocated, and we expect more funding to be confirmed in due course.

In addition, our Market Test Pilots have shown that small suppliers can deliver cost-effective broadband infrastructure in the hardest to reach parts of the UK, using a range of technologies. Feedback from customers across the pilots shows that they have been very pleased with the superfast broadband services they have received, whether by fibre, fixed wireless or satellite.

We are also proposing to support the market through the reform of the Electronic Communications Code which governs rights of access to private land, as well as making planning changes, and implementing the EU Broadband Cost Reduction Directive which will require operators to open up their ducts and poles for sharing.

We will continue to maintain a dialogue with industry to explore whether further action is needed to remove barriers to help improve the viability of commercial investment.

While it is clear that the various interventions that Government has made to date have resulted in much better broadband coverage in the UK than would have otherwise been the case, it is also clear that without further intervention there will still be some homes and businesses whose access to fast broadband will trail behind the rest of the county.

### ii) Scale of ambition including minimum speed

It remains the Government's intention to draft provisions in primary legislation which will allow the detailed specifications to be set in secondary legislation.

The consultation document outlined that the USO has its foundations in European law. The Universal Services Directive (USD) implemented in 2002, and revised in 2009, provides the framework within which the broadband USO must operate. Under the USD, Member States are required to ensure that all reasonable requests from 'end-users' for connection at a fixed location to voice and data communications, sufficient to permit 'functional internet access' are met. 'Functional internet access' is not defined in the Directive, and Member States have the flexibility to define a broadband USO according to their own national circumstances. There are, however, a number of considerations that have to be taken into account in implementing a broadband USO which constrain the speed at which a broadband USO might be set.

Universal service is intended as a safety-net which comes into play when the lack of an affordable service represents a serious obstacle to full participation in society. It should be delivered as efficiently as possible, and in a way that minimises market distortion. This latter point is particularly important as the USO should only be used where the needs of consumers are not being met by the market.

### iii) Delivery Timetable

We acknowledge the frustration of those struggling with slow broadband speeds, and are moving ahead as rapidly as we can to introduce a broadband USO to improve connectivity for all consumers.

There is, however, a lot of detailed work that needs to be undertaken to deliver a broadband USO to ensure that it will meet consumer expectations and that as many people as possible who want to take advantage of the broadband USO can do so. At the same time, we also need to ensure that the costs of delivering the USO are not disproportionate and that its design complies with the requirements of the Universal Service Directive. Given the likely high costs of providing the hardest to reach rural areas and some urban areas with 10Mbps broadband, we need to determine the costs of achieving maximum coverage over what timescale.

We have commissioned Ofcom to undertake some analysis to help us understand this better. A USO will guarantee the right to request an affordable connection to broadband of a minimum specified speed, from a designated provider on reasonable request. There may be exceptional circumstances when a request cannot be met such as where the costs of the connection exceed reasonable cost threshold, in which case the consumer will still be able to secure a connection but may be asked to contribute. One of the key questions that Ofcom is considering is what might be defined as a "reasonable" request for a connection, and what might be an appropriate cost threshold, the costs of which the designated Universal Service Provider might be expected to cover and above which level the consumer might be expected to contribute. A consumer contribution for the installation of new infrastructure is common to all essential services be it gas, electricity, water, sewerage or telecoms, although connection costs will vary depending on the type of

infrastructure, and the length of the connection.

### iv) Competition / investment impacts

As noted earlier in this document, in designing the USO, the Government is keen to ensure that the USO builds on existing commercial, community and publicly funded networks and does not undermine them. We will explore what role smaller providers might have in the delivery of the USO and the role of different technologies in minimising the cost of delivering the USO.

# **Question 2**: We do not propose to specify speed in primary legislation. Should speed be specified in primary or secondary legislation?

Respondents made the following main points:

- A large number of respondents did not feel that they understood enough about the legislative process to adequately answer this question.
- Some felt that the speed ought to be set in primary legislation, for example, to provide certainty.
- The vast majority of those who responded to this question agreed with the Government's view that setting the speed in secondary legislation rather than primary legislation would provide the necessary flexibility to more readily upgrade the USO over time.

#### **Government response**

We do not propose specifying a minimum speed, quality or other detailed criteria in primary legislation. Technologies and service capabilities continue to improve rapidly, and it is important that any specifications can be updated over time to take account of these developments. Secondary legislation can be revised more easily, and is therefore a more appropriate means to specify the minimum level of service.

Question 3: 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?

Respondents made the following main points

- A number of respondents believed that Ofcom should oversee the USO, and that there should be no ongoing role for Government.
- The majority of respondents said that they saw a continuing role for Government in overseeing the USO.
- A small but significant number of respondents offered no view on this issue.

### **Government response**

In view of the importance of digital connectivity to economic growth and productivity, the Government wishes to ensure that any broadband Universal

Service Obligation keeps pace with people's needs. Ofcom has the expertise to assess the appropriate minimum connection speed and quality over time.

The Government wishes to take a power to enable it, if appropriate, and in consultation with Ofcom, to specify the extent of the review, the matters to be reviewed and the time scale.

### Other issues raised

As well as responding to the specific consultation questions, respondents raised a number of issues that will need to be considered when it comes to the design and implementation of the USO which will be the subject of a second consultation. The key issues raised include:

- (i) Speed and quality specifications of the USO
- (ii) Appropriate technologies to deliver services under the USO

- (iii) Eligible providers
- (iv) Costs and funding (including pricing)
- (v) Competition considerations
- (vi) Various other design considerations.

### i) Speed and quality specifications of the USO

A number of respondents referred to various considerations that would need to be made when establishing the speed of the USO. The point was made that the speed should be based on the speeds people actually use on a day to day basis. Some respondents suggested the speed should be based on what people need to engage with Government and be an active citizen and consumer.

Other considerations raised include the need for the USO to support both residential and small business users and that the minimum speed should be both sufficient to support working and running a business from home.

There was a suggestion that the minimum speed should be differentiated based on geography. Some suggested that the speed should be linked to average speeds available across the country.

As well as comments on the ambition to set the USO at a minimum speed of 10Mbps, a number of respondents raised a number of other quality of service-related design considerations. The need to consider minimums for both download and upload speeds was raised. Responses also referred to the need to specify other criteria including reliability, latency and jitter.

Others suggested that one of the criteria was that the minimum speed should be available at peak times.

It was felt that clearly established service standards would be needed in order to hold the provider to account and that the consumer should be compensated if the service standards were not met.

The need for speeds to be future-proofed was mentioned in a number of responses; while another commented that careful consideration would be needed before increasing the minimum speed over time, as 10Mbps would be more than adequate in the years ahead even when taking into account simultaneous household use and small business needs.

### ii) Appropriate technologies

The need for the USO to be technology neutral was acknowledged. A range of views of the suitability of different types of technologies in delivering the broadband USO were expressed.

Respondents mentioned a range of different possible technologies beside fixed broadband, including: satellite, fixed wireless, and mobile.

It was recognised that these different types of technologies might have a role in reducing the cost of delivering the USO.

There were mixed views on the role that satellite could play in delivering services under the USO, with some saying that they considered it to be expensive and limiting, and others suggesting that it might be the most cost-effective solution for hardest to reach areas. Some respondents suggested that its use should be limited to provision for the most remote premises only. Other respondents, notably though not limited to satellite providers, considered that satellite would have a significant role in the delivery of USO services, and that satellite broadband is already available across the UK.

Many respondents suggested that fixed wireless would be a suitable technology for a demand-led scheme, particularly for rural areas where it was suggested that it would provide a cost-effective solution, and would help future-proof provision of services under the USO.

There were mixed views on the role of mobile in delivering connectivity under the USO; some could not see that it might have a role, while others considered that it could play a role but that monthly data costs for consumers might be too high.

While it is recognised that fibre connectivity may be desirable, respondents suggested it might be disproportionately costly and therefore not the most cost-effective solution, and others thought that it was impractical for the hardest to reach premises given the different topologies involved.

It was also recognised that because of the use of different technologies smaller providers would have a role in delivery of the USO, and this in itself would be important.

### iii) Eligible providers

As well as the role of smaller providers, and the potential use of different broadband technologies in delivering of the USO, concerns were expressed about placing the Obligation on small community-led providers. It was suggested that this type of provider is unlikely to be able to afford the costs of provision to increased numbers of premises, and that this could have a negative impact on the existing services that they provide. Their ability to provide 10Mbps services was also questioned given their ability to afford the necessary backhaul. It was suggested that Openreach should be placed under an obligation to supply sufficient affordable backhaul so that community-led schemes can supply 10Mbps services.

There was also a suggestion that given the potential role of different technologies, the provider or providers should be designated following an auction process.

### iv) Costs, pricing and funding

Many respondents noted that the level of cost threshold is critical in ensuring that those who want to be connected can be, and that the cost threshold should be set at a level to maximise coverage. Some called for guidance or clarity on what a reasonable request for connection should be.

It was noted that achieving a cost-effective solution would be key to maximising coverage. It was recognised that there should be appropriate

caps on private, public, and consumer funding, and that under a demandled scheme aggregation of demand will be important to ensure efficiencies.

A number of respondents asked whether government funding would be available to fund the USO, with some expressing the view that this would be essential. If Government funding is available, there was a suggestion that a voucher scheme would be preferable to a supplier subsidy. Local authorities expressed concern over whether they would be required to fund the USO, as it would have implications for their resources.

There were calls for transparency around financing arrangements, and the connection costs per premise.

Regarding pricing, respondents noted the importance of defining what an 'affordable' service was considered to be, and that the affordability of both the connection and of the service should be considered. It was suggested that rural and remote premises should pay no more than premises on urban fibre-based networks, and that the USO should be structured to ensure that there are no financial disincentives for those in remote rural communities who request a USO service. Some respondents also called for uniform pricing in the same way as applies under the telephony USO. There was also some support for a social tariff.

### v) Competition and investment

Respondents expressed concern that there was considerable potential for unintended consequences and distortions to the market, with some suggesting that there was a possibility of a USO entrenching market dominance, for example, if Openreach were designated as a universal service provider.

Responses highlighted the need to consider current and planned deployments, both commercial and public investments, and how this investment could be maximised.

Responses also highlighted the need to consider whether to and how best to fill potential 'not-spots' in a way that minimises adverse impacts to competition and investment.

It was suggested by some that the USO should only serve consumers who are in areas of explicit market failure, and by others that the USO should focus on areas where there is no more than one market player.

There were calls for the Government to provide greater clarity about its objectives for the USO as this would support a robust assessment of costs and benefits, and help determine funding requirements.

In particular, responses highlighted that careful consideration would be needed to ensure that any coverage in urban areas avoided market distortion by covering areas that would be commercially viable. A number of respondents made the point that clarity was needed on the market failure the broadband USO was seeking to address.

It was also suggested that the introduction of a broadband USO should be looked at in conjunction with the components of the existing telephony USO, to help create a more accurate assessment of the potential burden on industry.

### vi) Other

Other points raised included the need for penalties to ensure the USO is delivered, and consumer compensation if they are dissatisfied with the service provided.

The need for awareness raising of the USO to encourage take-up was flagged, and that it needs to be promoted on a proactive basis otherwise its impact will be diluted. There was a suggestion that the USO would only work if digitally excluded individuals and businesses are well informed of the benefits of faster speeds, and that it would be important that the USO works alongside local government digital inclusion strategies. It was also suggested that Parish Councils would have a role to play in helping raise awareness about USO.

A number of respondents noted that the USO would be a means of ensuring that connectivity to new builds was improved.

There were also calls for consideration to be given to uniformity not only in terms of cost, but also in terms of access, speed, and service levels.

### **Government response**

A wide range of issues were raised that will need to be considered when it comes to specifying the design on the USO. We intend to consult on these issues fully ahead of setting any specifications in secondary legislation and once Ofcom has completed its analysis.

## **Next Steps**

The government will look to bring forward primary legislation at the earliest opportunity. At this stage it is too early to say how soon residential consumers and businesses will be able to make a request to be connected under the USO. The process of developing the new broadband USO is a lengthy one, and there are a number of regulatory steps that need to be taken involving both Government and Ofcom. We are working to implement the USO as soon as we can and recognise how important an issue this is for areas of the country not served by commercial roll-outs or the Government's Superfast Broadband Programme.

The Secretary of State has commissioned Ofcom to undertake detailed analysis of the key factors that will help inform the design of the USO. We are asking Ofcom to report on its findings by the end of the year. The commissioning letter is publicly available at

http://stakeholders.ofcom.org.uk/binaries/consultations/broadband-USO-CFI/annexes/DCMS\_Letter.pdf. In support of this work, Ofcom has issued a call for inputs which will run until 23rd June and this is also available at http://stakeholders.ofcom.org.uk/consultations/broadband-USO-CFI/.

When in receipt of Ofcom's analysis, proposals for draft secondary legislation will be published for scrutiny and consultation. A regulatory impact assessment will accompany that consultation. This second consultation will cover the detail of the USO, its scope, including specific requirements and guidance for the design of the USO. It will provide an opportunity to comment on the design of the USO and how it is to be implemented.

Once the secondary legislation is in place, Ofcom will then carry out further work on the detailed design and regulatory implementation. The Government intends for the USO to be in place by 2020 at the latest.

# **Annex A: List of respondents**

Listed alphabetically, the following groups and organisations responded to DCMS's public consultation on the process it intends to follow to implement the broadband USO. 76 individuals, including four Members of Parliament, also responded to the consultation.

Parliament, also responded to the
Aardman Animations Ltd
Ansley Parish Council
Avanti
B4RDS
BCS
Bee Bee Kennels
Bellamy Rural
Bionanovate
Bircham Parish Council
Bishop's Itchington Parish Council
British Chambers of Commerce
Broadband for Rural Kernow
Broadband Stakeholder Group
ВТ
Burrington Parish Council
Burton Dassett Parish Council
Business Exmoor
Central Bedfordshire Council

Cheshire East Borough Council

CISCO
CLA
Combe Fields Parish Council.
Communications Consumer Panel
Communications Workers Union
Connecting Shropshire
Consumer Council for Northern Ireland
Convention of Scottish Local Authorities
Corpusty and Saxthorpe Parish Council
Countryside Alliance
Craich Cottage
Department Enterprise, Trade & Investment Northern Ireland
Derry City & Strabane District Council
Dundry Parish Council
Easy Net Site
Echostar
EEF
Essex County Council
FarrPoint
Fermanagh & Omagh District Council
Flamstead Parish Council
Focus Consulting
Forum of Private Business

Foundation for Information Society Policy **FSB** Gavinton, Fogo & Polwarth Community Council Gigaclear Gordon and Westruther Community Council **Grantshouse Community Council Great Bealings Parish Council Great Gaddeston Parish Council GreySky Consulting** Hampton-in-Arden Parish Council Hasketon Parish Council **Henry Harington** High Peak Borough Council **Hull City Council Ideford Parish Council** Irish Central Border Area Network **ISPA KCOM Kent County Council** Kingston Seymour Parish Council Lammermuir Community Council LGA

Langcross

Loddon Parish Council

**Lothian Broadband Networks** 

Market Weston Parish Council

Marlingford and Colton Parish Council

Meriden Parish Council

Micron Data Solutions

Mid Ulster District Council

Mill Pond Flower Farm

**Monkton Parish Council** 

Moorsweb Community Broadband

Norfolk County Council

Northamptonshire County Council

Ofcom Advisory Committee for Northern Ireland

Ofcom Advisory Committee for Scotland

One Web

**Ordnance Survey** 

**Oxfordshire County Council** 

**Oxhill Parish Council** 

**Peak Electrics** 

Pozzoni Architects

Rockland St Mary with Hellington Parish Council

**Rural Services Network** 

Rushden and Wallington Parish Council

Scirum Ltd
Scottish Government
Scottish Rural Parliament
Shustoke Parish Council
Sky
Snettisham Parish Council
South Norfolk 4 Villages
SSE
Stoneleigh & Ashow Parish Council
Stratton Strawless Parish Council
Swanton Abbott Parish Council
Swanton Morley Parish Council
techUK
Tees Valley Rural Community Council
Telefonica
The Bit Commons
Three
Trinity Broadband
Tunstall Parish Council
UK Broadband
UKCTA
UKspace
Viasat

Virgin Media

Vodafone

Voice of the Listener & Viewer

Wansdyke

Wealden District Council

Welsh Government

Wherwell Parish Council

WildGoose

WiSpire

Yate Town Council