

I am writing to you in response to the recent publication of the Digital Britain – Interim Report Jan 2009.

Energy Networks Association (ENA) is the body representing the UK's electricity and gas transmission and electricity distribution companies and has 13 member companies and eight associate member companies.

ENA welcomes the report and the opportunity to respond to the invitation for feedback and comments. We support the upgrade of broadband to enable faster and more reliable broadband services within the UK.

ENA and member companies, as providers of UK's critical infrastructures of electricity and gas are dependent on an effective and resilient communications infrastructure to enable networks to be managed safely and efficiently. ENA is pleased to note that the report entertains radio spectrum allocation mechanisms other than auctions which we consider impractical for regulated industries such as gas and electricity transmission and distribution. ENA members would not expect to be given special concessions on tariffs applied to spectrum, but is concerned that 'administrative incentive pricing' will be used to apply values applicable to public cellular and broadcast spectrum to other users when it is inappropriate so to do.

Some ENA members are concerned that the pressure implied in the report to reform 2G spectrum for 3G will leave large inventories of existing 2G equipment in remote locations unable to maintain service and expensive to replace to maintain service to rural communities.

There may be an opportunity to consider the application of broadband nationally within Digital Britain report in coordination with the work that has been progressing with the smart metering ensuring cost effective implementation of possibly similar communications applications.

Annex 3 of the report refers to the "The Next Phase of Broadband UK: Action Now for Long-Term Competitiveness: A Review of Barriers to Investment in Next Generation Access, by Francesco Caio (2008)". We welcome the Government's intention to build on work already done such as the improved coordination of street works in support of Next Generation Access. ENA Member Companies already have significant involvement in co-ordination and ENA has members and works closely with the National Joint Utilities Group (NJUG).

The Traffic Management Act 2004 also builds on a number of provisions designed to incentivise greater co-ordination of both street and road (highway) works and we already support the objective to reduce congestion by greater co-ordination of utility and local authority works, with existing voluntary and statutory measures that provide incentives. Minimum dig technologies are continually evolving and with operational and commercial practicalities mean there is little opportunity to achieve extensive installation of broadband fibre cables by laying ducts with other utility works. However, focus should be on improving coordination of these works with other planned work programmes.

Energy Networks Association