

Scottish 4G Infill Programme Consultation: Request For Information

Scottish Government and Scottish Futures Trust

September 2018



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Introduction

The Scottish Government (SG) and Scottish Futures Trust (SFT) have worked in partnership to develop the Scottish 4G Infill Programme (S4GI). The S4GI programme's aim is to deliver 4G LTE infrastructure and services to around 50-60 complete "notspots" in Scotland, and is backed with up to £25 million, which includes matched funding from the European Regional Development Fund (ERDF) to support activity in the Highlands and Islands region of Scotland. The programme has undergone a procurement process and in July 2018 appointed WHP Telecoms Ltd as the infrastructure provider.

In 2017, the programme consulted on a set of proposed target locations which ultimately elicited 16 sites which now comprise the programme's initial locations. This new consultation seeks to identify further locations which can facilitate the deployment of 4G LTE infill coverage where this does not yet exist, and where it is unlikely that industry will invest in the near to medium term future, given the economic challenges of doing so.

Purpose of this Consultation

This public consultation seeks to expand the intervention area of the S4GI programme from the initial 16 sites. To enable this, 100 potential areas of interest have been identified. SG and SFT wish to test these potential locations and their applicability for the programme to enable the £25 million available funding to be maximised, whilst adhering to geographic spend restrictions associated with the ERDF-funded and match-funded elements of the funding.

This consultation also serves to ensure compliance with the European Commission's Broadband Guidelines. These are EU Guidelines¹ which set out how governments should apply the European Commission's State Aid rules in relation to the deployment of broadband networks. For these purposes, 4G LTE is classified as an next generation access (NGA) broadband service. The objective of the S4GI programme is to provide access to mobile NGA infrastructure which is capable of delivering 4G LTE services.

EU regulations are designed to ensure that any use of public funding ('State Aid') is targeted at areas of market failure and produces positive market outcomes while minimising any distortion to competition. The State Aid rules require public interventions to be targeted so as to limit the risk of crowding-out or disincentivising existing and/or concrete planned private sector investments that would otherwise meet the desired policy objectives. In the context of broadband, the General Block Exemption Regulations permit the use of public funding only to extend broadband coverage in geographic areas where there is no provision of basic broadband or NGA broadband service or network and it is unlikely to be developed in the near future (within the next three years).

In accordance with this requirement, SG is holding a public consultation through publication of this consultation document on its website.

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2013:025:0001:0026:en:PDF>

Approach

To ensure the success of the programme, engagement and consultation will help make our overall strategy and performance more effective. We will do this by consulting about our intentions and others' views. We will gather feedback and analyse the results of the consultation, report on the results, and use this to inform our planning and priority setting.

1. Principles

The following principles will underpin all engagement activity. Engagement activity will:

- be **proportionate** both for the group being consulted and to the purpose of the engagement.
- be **open, transparent and focused**, being clear how their views will be used and what they may influence.
- be **consistent and joined up** ensuring no group has undue influence or access, but that engagement is tailored to the commitments and interests of the audience.
- **support and promote improvement** by sharing findings with key stakeholders e.g. partners, colleagues and wider Government departments.
- be **accountable and cost effective**, using the necessary resources and time to make a difference, and properly evaluate findings.

2. Levels of Engagement

We will engage with interested parties at the appropriate level, in appropriate ways and at appropriate times. The ways we engage with users, stakeholders and interested parties will depend on what we are trying to achieve. Engagement will operate at a number of levels:

- **information** – providing information about the service (including information about how to engage with services locally) and future changes to the way the service operates.
- **consultation** – seeking opinions about areas of our work and about the services we provide.
- **involvement** – engaging customers and corporate partners in becoming part of the solution by listening to their views and supporting them to bring about improvement.

In all of our engagement with users, stakeholders and interested parties, we will be clear about what we want to achieve and ensure that the means of engagement is designed to achieve that objective. We will tailor our engagement activities and use appropriate methods and will be mindful of the context from the external perspective. Annex A outlines the likely levels and basis of engagement in relation to the programme.

S4GI – Progress to Date

SG and SFT conducted a public consultation on a proposed initial intervention area in August 2017². This elicited 16 initial locations which formed the basis of a procurement process which ran from March-June 2018, the purpose of which, was to identify an infrastructure provider for the S4GI programme. The procurement has concluded and the contract was awarded to WHP Telecoms Ltd in July 2018. WHP will be responsible for subsequent mast build ownership, operation and maintenance – and will deliver mobile services in partnership with a mobile network operator or operators.

All infrastructure built through the programme will be open access, future-proofed, be connected to backhaul capable of delivering 4G LTE services and be upgradable to 5G. Mast build will also be dependent of the commitment from at least one MNO to provide 4G LTE services at each location. The S4GI programme has now entered its delivery phase.

The S4GI programme will not deliver a service to all mobile notspots in Scotland – for the available funding we estimate that mobile services to around 50-60 locations in total could potentially be delivered by the programme, over the course of the four years until 2021/2022.

Expanding the Intervention Area – Selection of Areas of Interest

To expand the intervention area, SG and SFT needs to understand what complete notspots will remain after commercial rollout by the UK's four main mobile network operators (MNOs) is complete.

This programme is solely targeting complete notspots – that is, areas where there is no coverage from any MNO. Any location which has coverage from one, two or three – but not all MNOs – is outwith the programme's scope.

We have identified 100 areas of interest for potential inclusion in the programme. However not all of these will ultimately be included in the programme as we don't believe that the available funding will allow us to build more than 50-60 mast locations in total.

These locations have been derived through a process which, in the first instance, sought to identify 4G notspot locations identified from the best information available to SFT and SG; these include datasets from Ofcom and other UK Government programmes. These locations were then analysed against the following criteria:

1. Premises and associated population coverage uplift
2. Transport (road and rail) coverage uplift
3. Key tourism site coverage uplift
4. Geographic coverage uplift

² <https://www.gov.scot/Publications/2017/08/1017/downloads>

We have selected the top 100 locations from the resulting analysis as our potential areas of interest for the programme. These are shown on the map at Annex B, and in more detail at Annexes E - M. Grid References are presented in the table at Annex D.

For any of these areas of interest to subsequently be incorporated into the programme and progress build phase will require the following items to be achieved *and* for costs to be within £500,000 per location:

1. Anchor tenancy from at least one MNO (i.e. commitment to provide 4G services from that mast)
2. Landlord agreement
3. Planning permission
4. Power connectivity
5. Network Connectivity

Achievement of items 1-3 are mandatory. Achievement of items 4-5 will be subject to costs and could influence whether an area is viable or not.

If an area of interest meets the requirements above, subject to funding availability, it would be our intention to include it in the programme. It is important to note that through this consultation and engagement with industry and the regulator, the areas of interest may change. The presence of location in the list of 100 sites does not guarantee that it will be included in the programme. Conversely, the absence of an area does not necessarily mean it would be excluded from the programme, if it can be evidenced that it meets the eligibility criteria outlined above.

We now seek views from those who may be able to support the provision of this network infrastructure in the target areas. This could be through ownership of specific telecommunications infrastructure or have plans to build such infrastructure. Also, we seek input from wider stakeholders such as local authorities on the potential intervention area.

Timescale

This consultation will run for 4 weeks from 10 September 2018 to 8 October 2018.

Your Response Required

We are sending this consultation to all principal mobile infrastructure and service providers, and are notifying Local Authorities. In addition, we are publishing this consultation document on our website. We welcome responses from any organisation or individual.

We require responses to the Consultation Questions set out in **Annex C**.

When responding to these questions, please provide the following information:

- Your organisation's name
- Your organisation's address
- Your name
- Position

- Contact email address

Please send your response to arrive not later than **23:59 on 8 October 2018**. You can respond via email to: 4Ginfill@Scottishfuturestrust.org.uk or in writing to:

4G Infill Programme
Scottish Futures Trust 11 – 15 Thistle Street
Edinburgh
EH2 1DF

Please note that the data you provide in your response will be treated as commercially confidential to SG and SFT, albeit that it may be necessary to share/some all of your response data with our professional advisors and/or BDUK, Ofcom, BIS State Aid Branch and the European Commission in the course of seeking State aid approval for our project.

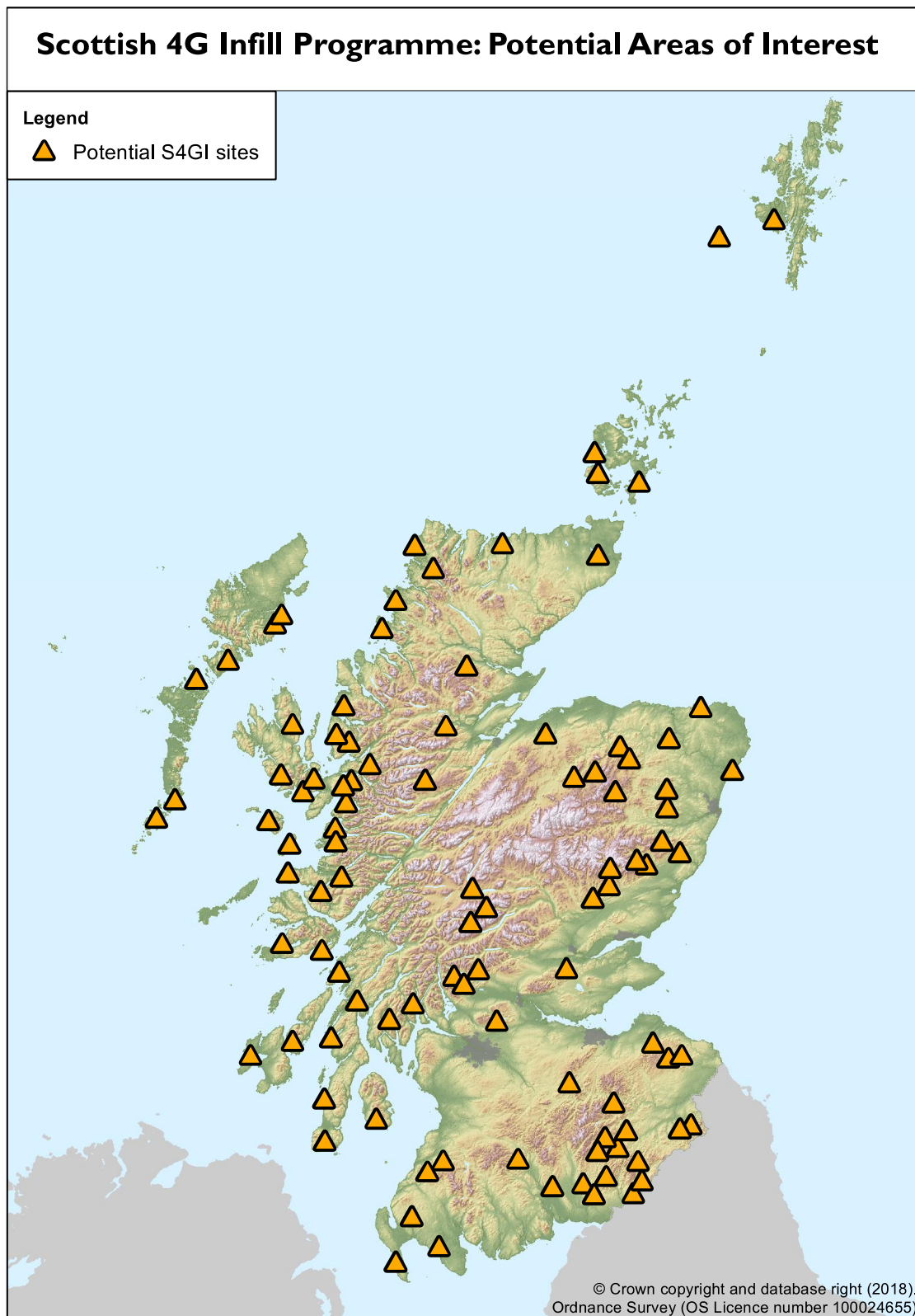
If you have any questions about any of the above, please contact 4Ginfill@Scottishfuturestrust.org.uk

Annex A - Approach to Engagement

| Engagement Plan Group | Engagement Method | Communication Method | When | Frequency |
|---|-------------------|--|--------------------------------|---|
| Providers of mobile infrastructure services | Consult | <ul style="list-style-type: none"> • Website • Verbal messages • SMS • E-mail • Customer survey | Within the consultation period | Throughout consultation period |
| Other interested parties | Consult | <ul style="list-style-type: none"> • Website • Verbal messages • SMS • E-mail • Customer survey | Within the consultation period | Throughout consultation period |
| Strategic partners, Delivery partners | Inform | • Dictated according to preference and proportionate to the significance of the issue. | Within the consultation period | As appropriate Throughout consultation period |

Annex B – Map of Potential Areas of Interest

Map 1



Grid references for all sites are set out in Annex D.

Annex C - Consultation Questions

Question 1

If you are a provider of mobile infrastructure services, do you have any current or planned (next 3 years) investments within a 10 km radius from the grid reference indicated on the maps?

Question 2

If you are provider of mobile services, do you have any current or planned (next 3 years) investments of commercially available (open for public use) 4G LTE services within a 10 km radius from the grid reference indicated on the maps?

Question 3

If you are an interested party regarding mobile infrastructure services, do you have any current or planned (next 3 years) investments within a 10 km radius from the grid reference indicated on the maps?

Question 4

If you are a fixed telecommunications provider do you or are you developing fibre solutions that could provide cost effective >1Gbps service in remote rural areas.

Question 5

If you are a member of the public, do you have or are you aware of any current or planned (next 3 years) investments within a 10 km radius from the grid reference indicated on the maps?

Question 6

If you are a local authority or a member of the public, are you are aware of any complete 4G mobile notspots (defined as 5 km radius from a central point)³. If yes, please supply a 6-figure grid reference for a central point in which a 5 km radius can be placed, along with any other evidence you can provide to demonstrate the lack of coverage in that area

If you have answered yes to 1- 5 of the questions above, please provide information concerning current or planned (next 3 years) investments in the target areas indicated on the maps. For question 6 please supply the required information within the question.

Responding to this Public Consultation

When responding to these questions, please provide the following information:

- Your organisation's name
- Your organisation's address
- Your name
- Position
- Email address

³ A complete 4G mobile notspots is defined as no 4G signal received by a 4G-compatible mobile handset from all the main network providers: EE, Telefonica (O2), Vodafone and Three.

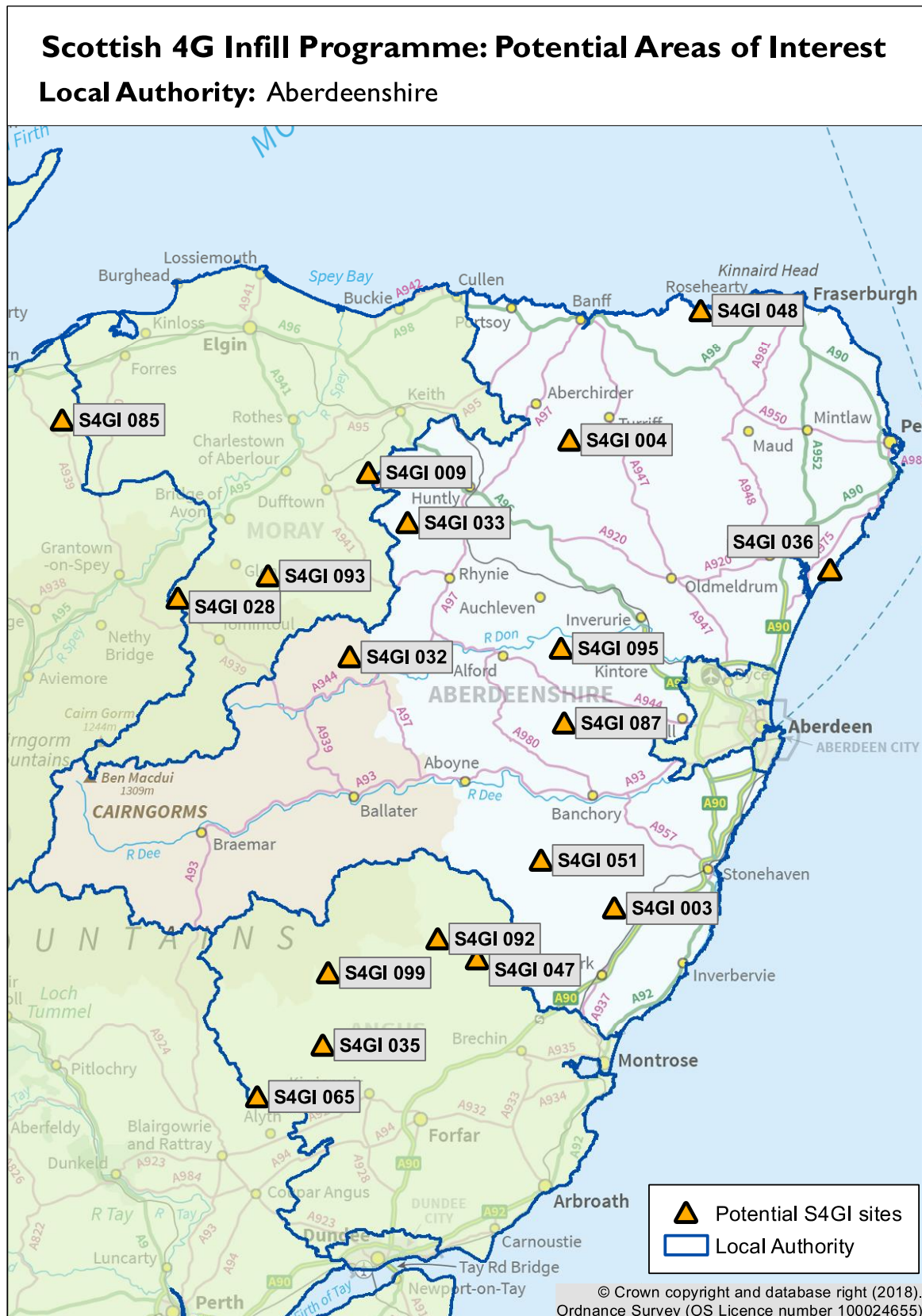
Annex D – Location Data for Proposed Areas of Interest

| Site Reference | Grid reference | Easting | Northing | Local Authority |
|----------------|----------------|-------------|-------------|-----------------------|
| S4GI 003 | NO73234 80347 | 373234.7606 | 780347.673 | Aberdeenshire |
| S4GI 004 | NJ66871 46668 | 366871.8694 | 846668.307 | Aberdeenshire |
| S4GI 032 | NJ3575115918 | 335751.1854 | 815918.8376 | Aberdeenshire |
| S4GI 033 | NJ4389034900 | 343890.4787 | 834900.9883 | Aberdeenshire |
| S4GI 036 | NK0378228291 | 403782.1679 | 828291.8374 | Aberdeenshire |
| S4GI 048 | NJ8541864992 | 385418.2231 | 864992.7653 | Aberdeenshire |
| S4GI 051 | NO6277987143 | 362779.673 | 787143.894 | Aberdeenshire |
| S4GI 087 | NJ6607406574 | 366074.5492 | 806574.3826 | Aberdeenshire |
| S4GI 095 | NJ6561617138 | 365616.4251 | 817138.1879 | Aberdeenshire |
| S4GI 035 | NO3188661012 | 331886.597 | 761012.348 | Angus |
| S4GI 047 | NO5380373165 | 353803.4911 | 773165.9809 | Angus |
| S4GI 092 | NO4817276040 | 348172.5651 | 776040.727 | Angus |
| S4GI 099 | NO3271571231 | 332715.1536 | 771231.5496 | Angus |
| S4GI 018 | NM41757 27630 | 141757.8486 | 727630.5238 | Argyll and Bute |
| S4GI 044 | NR6627036796 | 166270.3404 | 636796.6815 | Argyll and Bute |
| S4GI 056 | NS1800392250 | 218003.6256 | 692250.8207 | Argyll and Bute |
| S4GI 058 | NS0429383383 | 204293.3811 | 683383.4696 | Argyll and Bute |
| S4GI 068 | NM6471723706 | 164717.4625 | 723706.1586 | Argyll and Bute |
| S4GI 069 | NR8544594133 | 185445.574 | 694133.6224 | Argyll and Bute |
| S4GI 071 | NM7500710741 | 175007.8744 | 710741.5847 | Argyll and Bute |
| S4GI 079 | NR6664112574 | 166641.1631 | 612574.0555 | Argyll and Bute |
| S4GI 082 | NR4776770504 | 147767.1895 | 670504.9643 | Argyll and Bute |
| S4GI 083 | NR2320362377 | 123203.4054 | 662377.0228 | Argyll and Bute |
| S4GI 086 | NR7031572610 | 170315.7252 | 672610.8531 | Argyll and Bute |
| S4GI 013 | NS79057 01872 | 279057.3621 | 601872.8502 | Dumfries and Galloway |
| S4GI 015 | NX07721 42042 | 207721.453 | 542042.0661 | Dumfries and Galloway |
| S4GI 022 | NY1691487687 | 316914.4653 | 587687.5181 | Dumfries and Galloway |
| S4GI 040 | NY2346481218 | 323464.1122 | 581218.9369 | Dumfries and Galloway |
| S4GI 060 | NX9928885901 | 299288.8501 | 585901.8063 | Dumfries and Galloway |
| S4GI 066 | NX3298850928 | 232988.8829 | 550928.9189 | Dumfries and Galloway |
| S4GI 077 | NY3037991789 | 330379.7649 | 591789.6937 | Dumfries and Galloway |
| S4GI 088 | NX1728868470 | 217288.9248 | 568470.2003 | Dumfries and Galloway |
| S4GI 089 | NT2530606476 | 325306.9344 | 606476.3911 | Dumfries and Galloway |
| S4GI 049 | NT5763269584 | 357632.9041 | 669584.3438 | East Lothian |
| S4GI 001 | NC07745 27376 | 207745.4356 | 927376.1252 | Highland |
| S4GI 006 | NG79139 09393 | 179139.924 | 809393.5035 | Highland |
| S4GI 012 | NH49039 88974 | 249039.7146 | 888974.9558 | Highland |
| S4GI 014 | NC69972 60265 | 269972.1816 | 960265.2294 | Highland |
| S4GI 016 | NC29636 45899 | 229636.4092 | 945899.1262 | Highland |
| S4GI 020 | NC1905559329 | 219055.4372 | 959329.7266 | Highland |

| | | | | |
|----------|---------------|-------------|-------------|----------------------|
| S4GI 024 | NM7252094794 | 172520.4588 | 794794.3915 | Highland |
| S4GI 031 | NG8205122362 | 182051.4173 | 822362.8412 | Highland |
| S4GI 038 | NG8061644585 | 180616.1051 | 844585.8121 | Highland |
| S4GI 039 | NH3721554158 | 237215.5976 | 854158.2573 | Highland |
| S4GI 041 | NG7725819258 | 177258.4569 | 819258.5686 | Highland |
| S4GI 050 | ND2558353513 | 325583.8679 | 953513.441 | Highland |
| S4GI 052 | NH2512622473 | 225126.4614 | 822473.8914 | Highland |
| S4GI 053 | NG7774865812 | 177748.7775 | 865812.4467 | Highland |
| S4GI 054 | NM3359199173 | 133591.9194 | 799173.717 | Highland |
| S4GI 059 | NM4605485347 | 146054.8223 | 785347.8892 | Highland |
| S4GI 061 | NM6414457627 | 164144.0991 | 757627.8453 | Highland |
| S4GI 064 | NB9991611013 | 199916.4298 | 911013.8076 | Highland |
| S4GI 067 | NM4507968376 | 145079.1947 | 768376.5638 | Highland |
| S4GI 070 | NG4088325478 | 140883.8559 | 825478.4336 | Highland |
| S4GI 075 | NM7287086548 | 172870.0765 | 786548.5722 | Highland |
| S4GI 076 | NG5373815818 | 153738.3218 | 815818.8962 | Highland |
| S4GI 080 | NG9259231517 | 192592.7701 | 831517.7901 | Highland |
| S4GI 081 | NM7637666197 | 176376.1609 | 766197.0137 | Highland |
| S4GI 085 | NH9507149493 | 295071.2155 | 849493.2544 | Highland |
| S4GI 096 | NG7328549136 | 173285.3011 | 849136.4318 | Highland |
| S4GI 097 | NG4784355202 | 147843.6624 | 855202.5931 | Highland |
| S4GI 100 | NG6004923175 | 160049.7908 | 823175.3187 | Highland |
| S4GI 009 | NJ38413 42083 | 338413.8468 | 842083.7124 | Moray |
| S4GI 028 | NJ1144724208 | 311447.7452 | 824208.3563 | Moray |
| S4GI 093 | NJ2413727411 | 324137.3204 | 827411.6167 | Moray |
| S4GI 010 | NG10019 92298 | 110019.1849 | 892298.3205 | Na h-Eileanan an Iar |
| S4GI 027 | NB3775913480 | 137759.5681 | 913480.3284 | Na h-Eileanan an Iar |
| S4GI 043 | NF7927511274 | 79275.2361 | 811274.5153 | Na h-Eileanan an Iar |
| S4GI 057 | NF6846300496 | 68463.2115 | 800496.4341 | Na h-Eileanan an Iar |
| S4GI 073 | NB4122718745 | 141227.7229 | 918745.0831 | Na h-Eileanan an Iar |
| S4GI 091 | NF9168181326 | 91681.5725 | 881326.2352 | Na h-Eileanan an Iar |
| S4GI 084 | NR9628425121 | 196284.3346 | 625121.5016 | North Ayrshire |
| S4GI 017 | HY23582 13301 | 323582.4035 | 1013301.442 | Orkney Islands |
| S4GI 078 | ND4965095991 | 349650.5084 | 995991.1628 | Orkney Islands |
| S4GI 098 | HY2561601167 | 325616.4163 | 1001167.6 | Orkney Islands |
| S4GI 030 | NN6045748455 | 260457.9419 | 748455.7629 | Perth and Kinross |
| S4GI 055 | NO0721512907 | 307215.4 | 712907.5784 | Perth and Kinross |
| S4GI 065 | NO2265053709 | 322650.887 | 753709.078 | Perth and Kinross |
| S4GI 072 | NN5265359401 | 252653.6881 | 759401.4327 | Perth and Kinross |
| S4GI 002 | NT37016 08818 | 337016.7663 | 608818.7111 | Scottish Borders |
| S4GI 005 | NT79622 21919 | 379622.7641 | 621919.2669 | Scottish Borders |
| S4GI 021 | NT4895600698 | 348956.9304 | 600698.6255 | Scottish Borders |
| S4GI 025 | NT6649960620 | 366499.9585 | 660620.3302 | Scottish Borders |
| S4GI 029 | NT3485534700 | 334855.4752 | 634700.1223 | Scottish Borders |

| | | | | |
|----------|---------------|-------------|-------------|-------------------|
| S4GI 034 | NT2964214465 | 329642.0227 | 614465.5628 | Scottish Borders |
| S4GI 037 | NY4600381882 | 346003.99 | 581882.5614 | Scottish Borders |
| S4GI 042 | NT7328919336 | 373289.9466 | 619336.2556 | Scottish Borders |
| S4GI 046 | NY5105389131 | 351053.0214 | 589131.0165 | Scottish Borders |
| S4GI 063 | NT4224418401 | 342244.1442 | 618401.102 | Scottish Borders |
| S4GI 090 | NT7446262288 | 374462.1075 | 662288.9918 | Scottish Borders |
| S4GI 008 | HT96097 38825 | 396097.6499 | 1138825.103 | Shetland Islands |
| S4GI 094 | HU2814848758 | 428148.8601 | 1148758.723 | Shetland Islands |
| S4GI 026 | NS3540601110 | 235406.8223 | 601110.1714 | South Ayrshire |
| S4GI 062 | NX2639794548 | 226397.1436 | 594548.3035 | South Ayrshire |
| S4GI 019 | NT0880946377 | 308809.1782 | 646377.5237 | South Lanarkshire |
| S4GI 007 | NN41839 08331 | 241839.8814 | 708331.0398 | Stirling |
| S4GI 011 | NS66715 82147 | 266715.1951 | 682147.4345 | Stirling |
| S4GI 023 | NN4755303819 | 247553.6074 | 703819.7732 | Stirling |
| S4GI 045 | NN5572112071 | 255721.9586 | 712071.1481 | Stirling |
| S4GI 074 | NN5142539651 | 251425.8766 | 739651.8929 | Stirling |

Annex E – Proposed Areas of Interest: Aberdeenshire



Map 2

Annex F – Proposed Areas of Interest: Angus; Perth & Kinross



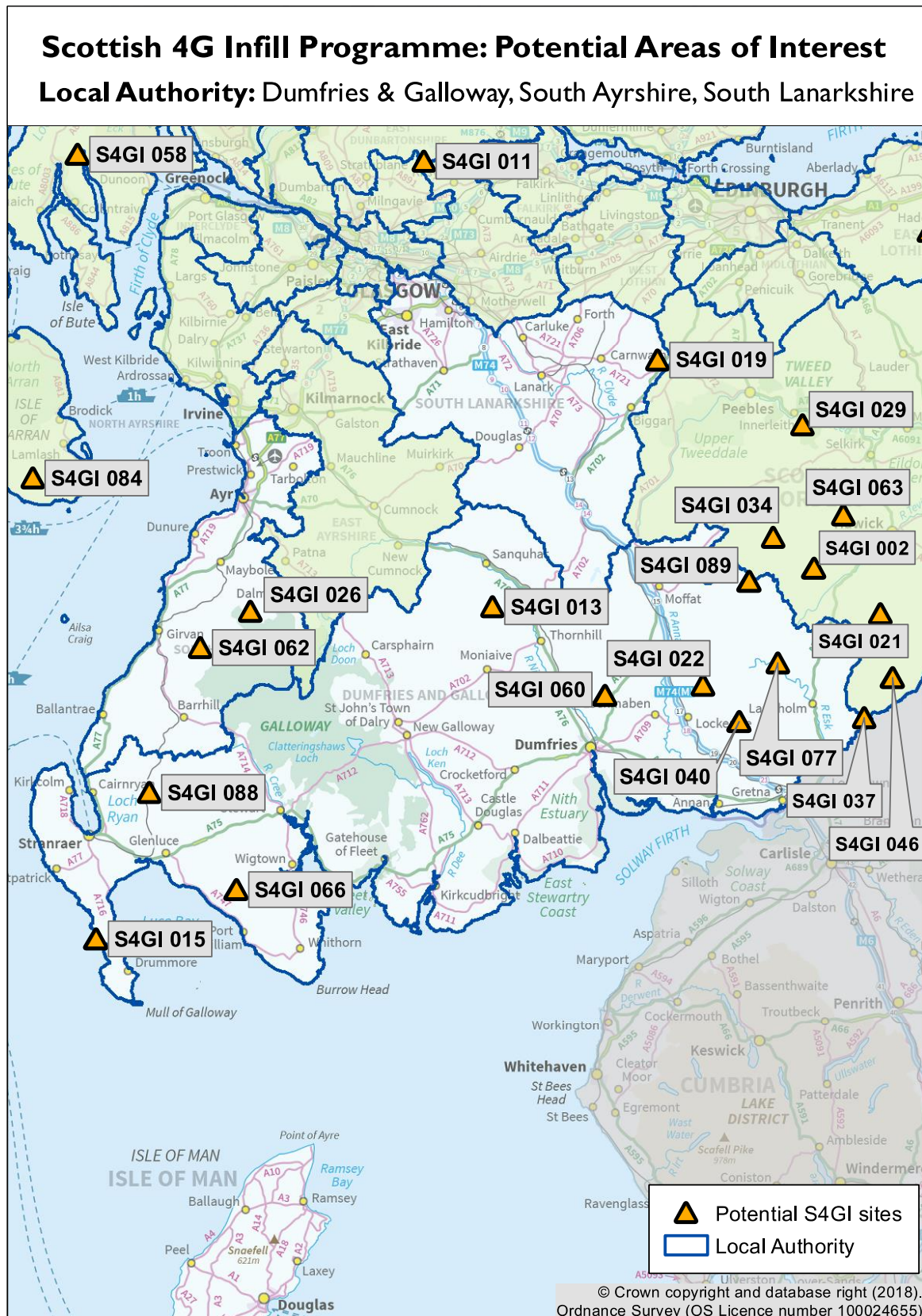
Map 3

Annex G - Proposed Areas of Interest: Argyll and Bute; North Ayrshire



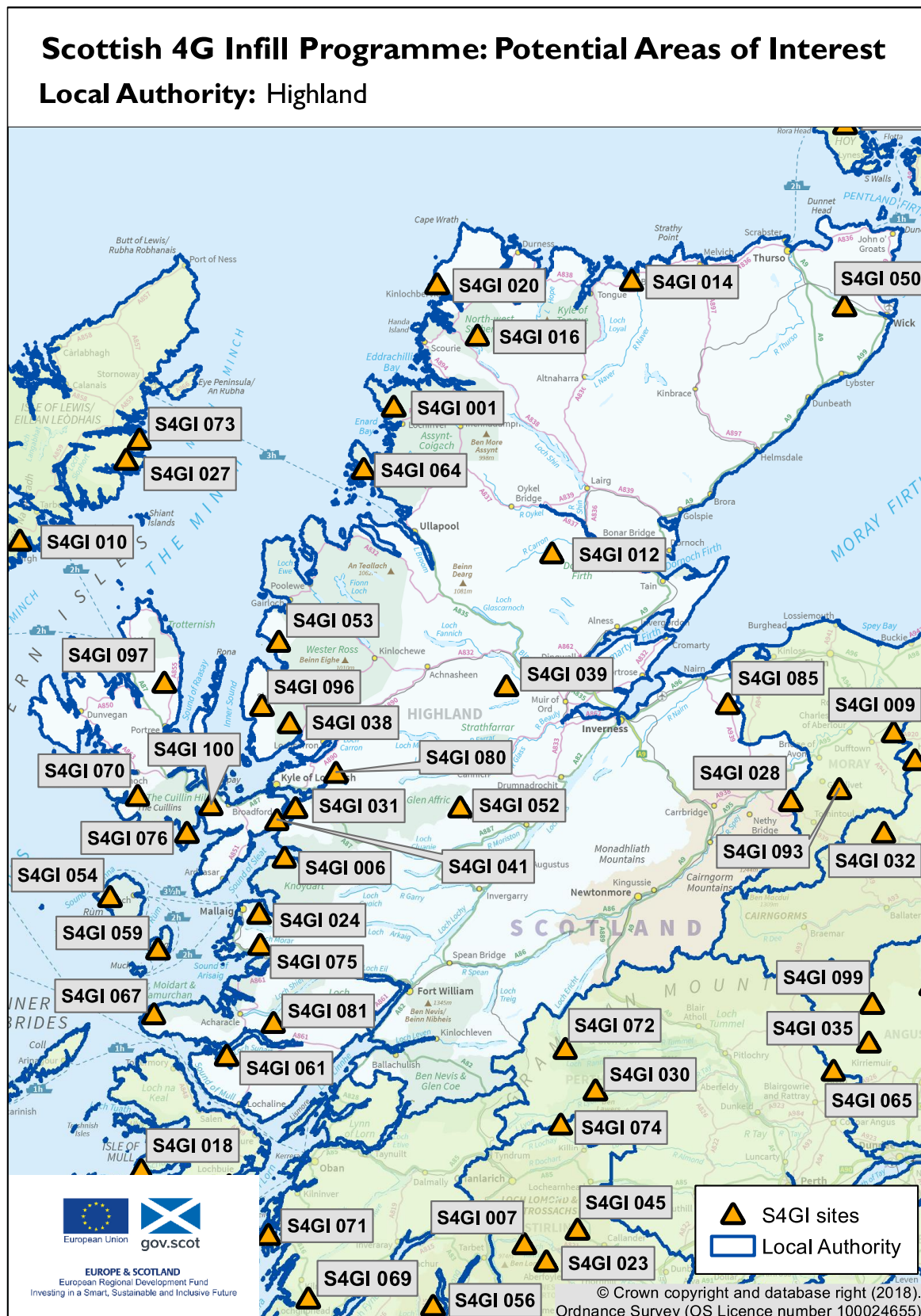
MAP 4

Annex H - Proposed Areas of Interest: Dumfries and Galloway; South Ayrshire; South Lanarkshire



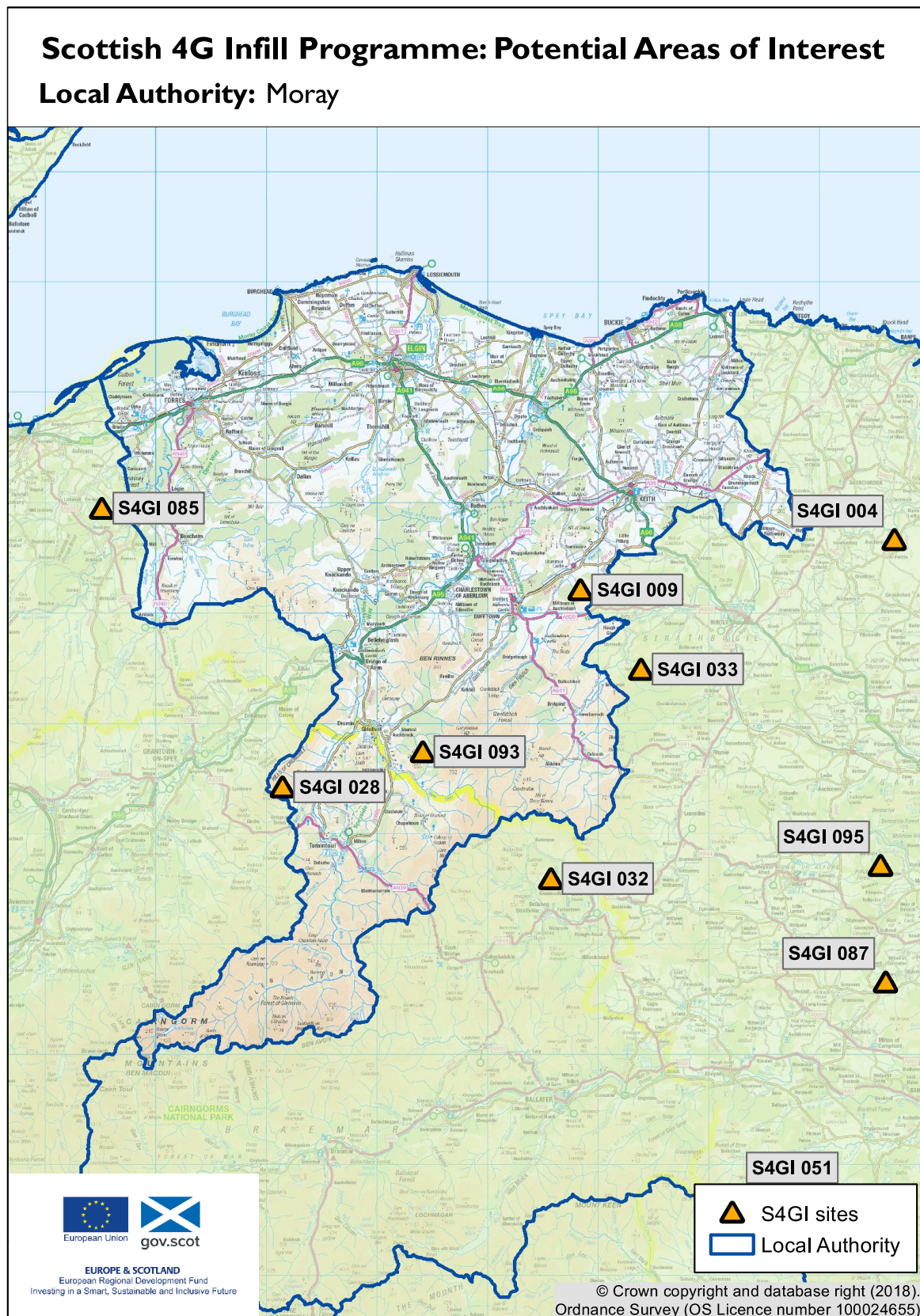
MAP 5

Annex I - Proposed Areas of Interest: Highland



MAP 6

Annex J - Proposed Areas of Interest: Moray



MAP 7

Annex K - Proposed Areas of Interest: Na h-Eileanan an Iar

Scottish 4G Infill Programme: Potential Areas of Interest

Local Authority: Na h-Eileanan an Iar



MAP 8

Annex L - Proposed Areas of Interest: Orkney Islands; Shetland Islands

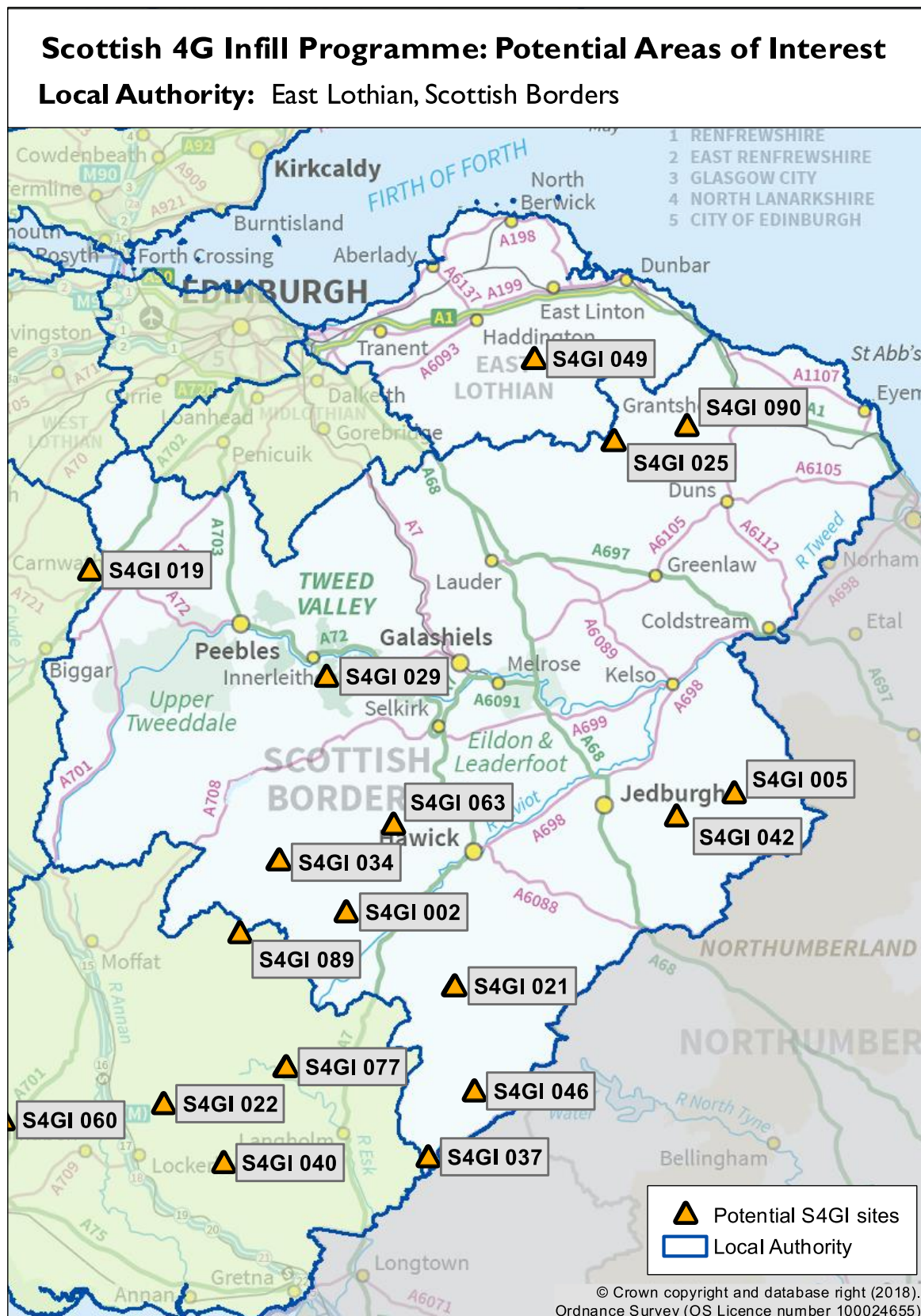
Scottish 4G Infill Programme: Potential Areas of Interest

Local Authority: Orkney Islands, Shetland Islands



MAP 9

Annex M - Proposed Areas of Interest: Scottish Borders; East Lothian



MAP 10



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