



National Joint Utilities Group Ltd  
111 Buckingham Palace Road,  
London  
SW1W 0SR  
[info@njug.org.uk](mailto:info@njug.org.uk)  
020 7340 8737

21<sup>st</sup> September 2009

Ed Richards  
Chief Executive  
C/o Gideon Senensieb  
Ofcom, Riverside House  
2A Southwark Bridge Road  
London, SE1 9HA

**Next Generation Networks: Responding to recent developments to protect consumers, promote effective competition and secure efficient investment**

The National Joint Utilities Group (NJUG)<sup>1</sup> welcomes the opportunity to comment on this consultation on next generation networks. NJUG is the UK's only trade association representing utilities on street works issues. Including members through trade associations, NJUG represents thirty-seven utility companies and twelve utility contractors. NJUG is also the utility arm of the Highway Authorities and Utilities Committee<sup>2</sup> working collaboratively with local authorities to better standards of road and street works in England, Northern Ireland, Scotland and Wales.

NJUG has a record of working in partnership with Government and welcomes the opportunity to respond to this consultation. Although some areas of the consultation are not of particular relevance to NJUG, the rollout of high speed broadband technology will obviously be affected by the ability of telecommunications firms to carry out street works effectively. NJUG continues to support this rollout of next generation access, which is essential if the UK is remain competitive and attractive to business as we continue to move into a challenging economic period.

However, we feel it necessary to note the constraints and pressures faced by our members. All utilities, including telecommunications companies, are under increased pressure from Government where street works are concerned, and it is important that Ofcom understand this, manage their expectations accordingly, and highlight this to Government through any discussions they themselves have on next generation networks. The swift roll out of high-speed broadband will be assisted by Government and utilities working constructively to minimise complicated and burdensome regulation that hinder industry's ability to access subsurface apparatus. At the same time, industry needs to work closely with Government to ensure current regulation is workable and implemented effectively, to increase the quality and efficiency of our works. One example of a potential problem is the London street works permit scheme which, if approved as currently drafted, will include all streets rather than only those that are traffic sensitive. This will add millions to utility bills and effectively reduce the capital available for broadband investment with little benefit to road users.

We would be happy to meet with you to discuss these points in greater detail. Should this be of interest, or if you have any queries relating to this response, please do not hesitate to get in contact.

Yours sincerely,

Les Guest  
CEO  
National Joint Utilities Group Ltd

Cc Richard, Buckley, Head of Traffic Management Division, Department for Transport

---

<sup>1</sup> Our current members include the Energy Networks Association (representing electricity and gas), Water UK (representing all water and wastewater companies), National Grid, Openreach, and Virgin Media. Our Associate Members, all of whom are utility contractors, are Clancy Docwra, Skanska Utilities, Balfour Beatty, Morrison Utility Services, Morgan Est, NACAP, PJ Keary, First Intervention, Carillion, Enterprise, Laing O'Rourke and Amec.

<sup>2</sup> For further information on HAUC(UK), please visit <http://www.hauc-uk.org.uk/>