

9 October 2017

Broadband USO Consultation  
Telecoms Directorate  
Digital, Culture, Media & Sport  
100 Parliament Street  
London  
SW1A 2BQ

Dear Mr Cockaday

**ACS Submission: Broadband Universal Service Obligation: consultation on design**

ACS (the Association of Convenience Stores) welcomes the opportunity to submit evidence to the Department for Digital, Culture, Media and Sport on the design of the broadband Universal Service Obligation. ACS represents over 33,500 convenience stores and forecourt shops across the UK including the Co-op, One Stop, BP and thousands of independent retailers, many of which trade under brands such as Spar, Nisa and Londis.

There are over 19,000 convenience stores trading in rural areas providing a core grocery offer alongside essential services such as access to cash through free-to-use ATMs (39%) and branches of the Post Office network (24%)<sup>1</sup>. 59% of rural stores trade as an isolated business with no other retail or service businesses close by but increasingly require access to reliable broadband connections<sup>2</sup>.

Digital access is needed by these businesses for online banking and wholesaler services and to facilitate the in-store provision card payments, ATM transactions and post office services. HMRC's Making Tax Digital reforms to require digital record keeping and online tax reporting, initially for VAT from 2019, will further enhance the need for reliable internet connections for rural businesses.

We support the specification of the Universal Service Obligation outlined in the consultation, including its download speed of 10 Mbps which is sufficient to allow retailers to perform their core business functions. We welcome the Government's commitment to review the specification as consumer and business needs change, but encourage the Government to continue its expansion of mobile data networks; currently mobile broadband usage impacts on bandwidth for internet connections.

ACS is open to further engagement with the Department for Digital, Culture, Media and Sport on delivering the broadband Universal Service Obligation and wider issues for rural convenience stores. For more information, please contact Steve Dowling, ACS Public Affairs Executive, via [steve.dowling@acs.org.uk](mailto:steve.dowling@acs.org.uk) or 01252 533009.

Yours sincerely



James Lowman  
Chief Executive

<sup>1</sup> ACS Rural Shop Report 2017

<sup>2</sup> ACS Rural Shop Report 2017