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BT Scotland

Mr David Thompson
Glasgow Commonwealth Games Bill Team
Scottish Executive
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Dear Mr Thompson

Draft Commonwealth Games Bill

I am writing on behalf of BT Scotland to respond to the consultation on the Draft Glasgow Commonwealth Games Bill to be enacted should Glasgow be successful in their bid to host the 2014 Commonwealth Games. We in BT Scotland wish the Glasgow bid every success and see it as a wonderful opportunity not only for Scottish competitors but for the economic benefits it will bring to the Scottish economy.

Our comments on the draft Bill are limited to sections regarding Games Transport Plans (section 31), Games Traffic Regulation Orders (section 32) and Urgent Traffic Regulation Measures (section 33.) We wish to ensure that any measures taken do not affect the ability of engineers to maintain access to crucial services such as 999 and care helpline numbers, as well as to service nearby businesses and residential customers that rely on telecommunications. As you will appreciate any loss of telephone service can have serious repercussions both to the individual – particularly the elderly and vulnerable and to the viability of businesses many of which simply cannot operate without telephone and internet access.

The engineers requiring access would, in the main, be from BT Openreach, the group responsible for “the last mile” of cabling from exchange to the end user. Whilst Openreach is part of the BT Group, they must offer equal pricing and service to all providers of telecommunications and are strictly prohibited from giving preferential treatment to any of BT’s commercial operations.

There are 4 key points we would like to make:

1. Whilst we appreciate the need for streets to be closed off to ensure the smooth running of the games, Openreach engineers will still need access to certain streets, with vans in most cases, in order to carry out essential maintenance to services. In addition, some maintenance may require specialist equipment onsite which may cause security concerns. We would be eager to discuss such practicalities at the earliest possible stage and, in addition, would like to be involved in drawing up the Games Transport Plan to ensure that such issues can be addressed.

2. We also believe it may be appropriate for the Bill to stipulate that access must be permitted for essential utility maintenance, which would also cover electricity, water, gas and any others felt appropriate. This is a particular concern relating to the Games Traffic Regulation Orders and Urgent Traffic Regulation which, as the Bill is drafted, seem to be able to be issued without any restrictions at all. Whilst we appreciate the need for maximum flexibility on the ground, we believe it may be appropriate to consider some kind of mechanism to inform or consult essential utility providers.
3. In the event that closures are necessary and engineers denied access, BT Scotland and Openreach would require maximum warning so as they could inform customers and potentially find other ways of addressing problems. As part of this, Openreach would consider setting up a presence in the heart of the Commonwealth area so that they were able to communicate effectively with planners and other key officials.
4. Finally, we have a number of practical questions which would like to discuss with officials from either the Scottish Government or the Commonwealth Games team (perhaps both in a joint meeting) as soon as possible:
 - Would BT staff need to be trained and accredited in specific security matters if they were working within the proximity of events?
 - Will there be a requirement for method statements describing how work will be carried out?
 - How will the process for vetting of staff being given access operate?
 - If restrictions require work to be carried out outwith normal hours who would meet the extra financial cost – this would include charges raised against us by customers if service level agreements are not met.

We hope that these comments above are of help to both the Government Bill Team and to the Commonwealth Games bid team. Both Fergie Collier (General Manager BT Openreach) and I would very much like to meet with the Bill Team at the earliest possible opportunity to ensure that, if Glasgow is successful, as we all hope, access issues can be addressed as early as possible to ensure the Games are a total success. In the meantime, please contact me if you require any further information or if I can be of any assistance.

Yours sincerely

Ian Shanks
Head of Scottish Affairs