
Digital Connectivity Strategy

Response from the American Chamber of Commerce Ireland (AmCham) to the Department of the Environment, Climate and Communications' public consultation.

April 2022

The American Chamber of Commerce Ireland

The Voice of US-Ireland Business

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and Investment.

AmCham welcomes the opportunity to contribute to the Department's public consultation on the Digital Connectivity Strategy.

Is the ambition level set out in the State's Digital Connectivity Strategy appropriate?

AmCham is of the view that the goals set out within the State's Digital Connectivity Strategy will be important in ensuring Ireland remains an attractive location for business and talent into the future. Delivering on the objectives of the Strategy will be essential in ensuring Ireland remains a destination of choice for inward investment.

AmCham notes the Digital Connectivity Strategy states that *"Digital technologies have a vital role to play in reducing energy and resource use, in enabling decarbonisation while maintaining social and economic welfare and in gathering and analysing data of importance to the tasks of mitigating and adapting to climate change, and protecting and restoring biodiversity and ecosystems."* In this context, AmCham outlines, as it previously highlighted in its submission to the Government's public consultation on the Climate Action Plan 2021, "Innovation is fundamental to the fight against climate change; developing the technology necessary to transform our economy." In this context, AmCham is of the view that the availability of adequate funding and the sharing of best practice to promote the development of innovative technologies which will support sustainability goals would be beneficial.

Are the strategic enablers set out in the State's Digital Connectivity Strategy appropriate? Do these strategic enablers need to be amended? Are further strategic enablers, initiatives or measures needed?

National Broadband Plan

The COVID-19 pandemic accelerated the advancement of the utilisation of digital solutions for both business and talent. As a result of the pandemic, remote and hybrid working solutions are likely to remain commonplace into the future. As part of this, talent has been empowered to take advantage of the option to work from home, with increased choice as to where they choose to locate.

In this context, it is essential that the roll out of broadband connectivity, in addition to the provision of faster internet speeds, is implemented as a priority to support both talent and business. As AmCham previously outlined to Government, the delivery of the National Broadband Plan, including the connection of blackspots, must be advanced with urgency to ensure the continued attractiveness of Ireland as a location of choice for business and talent.

Furthermore, it is important that cybersecurity protection is also considered as digital infrastructure is expanded. The acceleration of the roll-out of the National Broadband Plan, with the requisite cybersecurity protections, will be crucial for the delivery of digital public services.

Regulation

A number of the world's largest companies have regional headquarters in Ireland. The teams based in these headquarters serve global markets, manage global data and facilitate global financial services. Resulting from this, these teams require world-class protection and regulation. Ensuring that adequate resources and funding are provided for the provision of world-class regulation and protections, this context, is important. Furthermore, such funding and resourcing is also essential in ensuring Ireland's position as a regional regulatory hub within the EU is protected.

Network Integrity, Security and Modernisation

AmCham notes the Digital Connectivity Strategy states that *"Creating the safeguards to monitor and respond to cyber security threats and encourage network security is of uppermost importance for the sector."* AmCham is of the view that, in advancing connectivity and digitalisation, cybersecurity is of the utmost importance.

The increased deployment of 5G will also require an increased focus on security, given the fact that the attack surface is larger, and the intricacies related to securing 5G networks differ from that of other network types. 5G networks, and the leveraging by business of these networks, allow for ultra-low latency, industrial scale industry-of-things networks. It further provides for reliability, which is essential to business operations and allows for high levels of mobility. The importance of 5G for businesses can be reflected in its usage in terms of vital infrastructure, logistics, manufacturing, and utilities. This scale of importance highlights the critical nature of ensuring the necessary security is in place.

The need for cyber protection in relation to the usage and deployment of 5G is essential given the speed and volume of traffic related to 5G networks. Engagement with industry to ensure sufficient protections are in place would be beneficial, particularly in ensuring business is supported with regard to visibility of cyber threats, and controls to stop threats in real-time. Furthermore, through analytics and enforcement, supporting business in leveraging and utilising a zero-trust model for security purposes will be essential in terms of consistent security visibility for private networks and for edge clouds. The evolution of security measures, utilising analytics and the identification of security gaps will be important, as will the usage of measures to isolate and quarantine infected devices on a given network. Ensuring such protection measures are taken on the part of actors will be vital in ensuring the on-going security of connectivity services, and networks.

As the utilisation of digital solutions and advanced networks continues to increase in terms of the work of business, ensuring these systems and the associated services have adequate protection will foster greater confidence on the part of industry, and will benefit Ireland in its continued attractiveness as a location for inward investment.

Smart Cities/Towns, Rural Communities and Transport Corridors

AmCham notes the aim outlined in the Digital Connectivity Strategy which states that “*In tandem with Smart City/Town initiatives focus is also needed on supporting the development of smart applications and services for very rural communities where local bespoke solutions will be needed.*” The National Broadband Plan, and the increased utilisation of digital technologies will further support regional and urban growth, and through enabling remote and hybrid working, will support more money being spent in local economies. In this context, digital hubs in towns and villages across Ireland will be an important part of the solution.

The delivery of the Digital Connectivity Strategy’s goals will be important in supporting balanced regional development, which will be necessary to provide a viable counterweight to the pull of Dublin as Ireland’s capital city.

The Department welcomes any views on the State structures, agencies and resources needed to oversee and ultimately secure the delivery of the Digital Connectivity Strategy?

AmCham believes that it is important to ensure the National Cyber Security Centre is adequately resourced and funded, and in support of the continued prioritisation of and resourcing for cyber security within relevant public bodies, including the Commission for Communications Regulation.

AmCham is of the view that it is important the strategy, and its implementation, is reviewed on an on-going basis.

The Department welcomes any views on how to ensure a sufficiently skilled workforce, with the necessary competence and experience, is available to industry and the State so that Digital Connectivity Strategy can be delivered? The Department would welcome suggestions on the State’s role in encouraging the development of this workforce?

AmCham believes that, in order to ensure a sufficiently skilled workforce is available, with the necessary competence and experience, it is important that educational equipment and infrastructure is provided in relation to education, throughout Ireland, to mitigate any digital divide. Furthermore, AmCham is of the view that accelerating public interest in apprenticeships related to digital skills would be beneficial. This can be done through better career guidance and a public awareness campaign. AmCham believes in the promotion of increased apprenticeship options as an alternative pathway for students post-secondary level education, as outlined in our pre-budget submission 2021 to the Irish Government ‘Next Century Ireland’.

By developing public awareness of, and access to, digital retraining opportunities, and opportunities related to the skills required to advance digital connectivity, it will be possible to ensure a sufficiently skilled workforce is available. This could be advanced through partnership between the State and private enterprise. The pace of technology is advancing faster than ever before, as such, ensuring the infrastructure to support and empower talent in reskilling and adapting to advancing technology is essential. In achieving this, it is essential

that the combination of skills required for future roles is fully understood, and that approaches to support participation in life-long learning are promoted. Supports to empower talent and provide them with the skills, competencies and education that will be required as the working environment evolves will be important in closing any skills gaps, and educational and upskilling initiatives will be important in this context.

In the context of skills, it is AmCham's view that digital literacy is important and, as such, should be provided for, and made accessible to, all.