

Date: 28 June 2007

VIA EMAIL

European Regulatory Group
erg-secretariat@ec.europa.eu

Dear Sirs:

COMPTEL is pleased to provide these comments in response to the Consultation Document on Regulatory Principles for Next Generation Access, recently issued by the European Regulators Group ("ERG").

COMPTEL has a 25-year history as the largest and oldest association in the United States representing competitive facilities-based carriers, providers using unbundled network elements, global integrated communications companies, and their supplier partners. COMPTEL has over 260 members of all sizes and profiles that provide voice, data and video services in the United States and around the world. COMPTEL is headquartered in Washington, D.C.

COMPTEL would like to congratulate ERG for tackling the regulatory challenges posed by the deployment of IP-based access networks. COMPTEL agrees with ERG that finding the correct balance between promoting competitive access and facilitating investment is challenging. What is critical, however, is that interconnection and access to IP-based networks must be preserved in order to promote a competitive market that provides alternative service providers for consumers and incentives for new entrants to create new products and services. Regulators in every country need to find ways to ensure that new entrants have access to these new IP-based networks. An overall European framework is needed to guide national regulators.

It may be that new entrants will be the driving force beyond IP-network deployment in some areas. But in the current environment, where most residential users and a significant majority of business users are still served by the former monopoly carriers, new entrants must retain the ability to reach those end users in the most efficient manner. COMPTEL applauds ERG's efforts to address these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry James", with a long, sweeping horizontal line extending to the right.

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