



**BEREC -  
Body of European Regulators  
for Electronic Communications**  
via e-mail to: [berec@ec.europa.eu](mailto:berec@ec.europa.eu)

Brussels, Nov. 2<sup>nd</sup> 2011

**Consultation on  
“Draft BEREC work programme 2012 Board of Regulators”**

Dear Sirs,

We thank you for the invitation to respond to the above mentioned consultation. Kindly find herewith enclosed the official reply of the FTTH Council Europe.

If there are any queries please do not hesitate to contact us.

Yours sincerely,  
FTTH Council Europe

A handwritten signature in black ink, appearing to read 'CHOLDEN'.

Chris Holden  
President of the Board

A handwritten signature in black ink, appearing to read 'Hartwig Tauber'.

Hartwig Tauber  
Director General

The FTTH Council Europe welcomes the opportunity to comment on the draft BEREC work programme 2012.

The FTTH Council is an industry organisation with a mission to accelerate the availability of fibre-based, ultra-high-speed access networks to consumers and businesses. The Council promotes this technology because it will deliver a flow of new services that enhances the quality of life, contributes to a better environment and increased competitiveness. The FTTH Council consists of more than 150 member companies. Its members include leading telecommunications companies and many world leaders in the telecommunications industry (additional information is available at [www.ftthcouncil.eu](http://www.ftthcouncil.eu)). Telecoms operators are not members of the FTTH Council and we have our own perspectives regarding the appropriate regulatory policies to accelerate NGA deployments.

The promotion of FTTH networks is the core mission of the FTTH Council Europe, a basic tenet on the organisation's approach has been to promote a competitive model as the best way to activate market forces. The Council welcomes BEREC's role in ensuring consistency in regulation which promotes competition for the benefit of consumers and citizens.

With regard to the subject of the work programme, the FTTH Council wishes to work with and support BEREC in areas related to FTTH and other factors affecting network development.

The FTTH Council welcomes in particular section 3.6, Next Generation Networks –Access and notes that the deliverable in this area is scheduled for delivery in Q3 2012. Of particular importance, the FTTH Council believes will be the guidance BEREC can give regarding different models of investment, particularly around co-investment where a high degree of co-ordination will be required, especially from NRAs themselves. At a technical level the FTTH Council and its member companies would be happy to offer its expertise on different access mechanisms and technologies.

A continued request of the FTTH Council is the need to have benchmarking exercises and the FTTH Council believes BEREC should consider tracking NGA investments (and State Financing) and to compare the form of access deployed and progress being made in different Member States. This could be done in a similar manner to that proposed for roaming in section 3.2. The FTTH Council remains concerned that there is not sufficient co-ordination of activities within Member States. While the FTTH Council understands that competencies are often spread across different Ministries and Agencies, the FTTH Council believe that a greater degree of co-ordination would see more efficient and better utilised network investments. The FTTH Council would therefore like to see NRAs seize the role of co-ordinator-in-chief at a national level. A benchmarking report on activities on FTTH across Member States which would include co-ordination activities, levels of investment broken down into private and public expenditures as well as measures taken to reduce cost and or promote service take-up would be important data for future interventions and would signal NRA's willingness to take a leading role in promoting NGA.

The Council is pleased with the emphasis being placed on NGA in the work programme. The Council believes that accelerating NGA deployments by ensuring an appropriate investment model and also by ensuring competitive outcomes is a top priority for NRAs.

The FTTH Council would like to make clear that we as an organisation wish to support and work constructively with BEREC and that the Council is available to provide input and assistance on technical or policy parameters should a need arise.