

**From:**  
**To:**  
**Cc:**  
**Subject:** Public consultation on draft BEREC Guidelines on very high capacity networks  
**Date:** Thursday, April 2, 2020 12:22:14 PM  
**Attachments:** [image002.jpg](#)

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Madame,

Sir,

Thank you for the opportunity to comment on the draft BEREC Guidelines on very high capacity networks. Hutchison Drei Austria would like to comment on one specific aspect of the draft guidelines.

In Section 3 Recital 16 of the guidelines, BEREC defines criteria for VHCN. Criterion 2 states that any network providing a wireless connection with a fiber roll out up to the base station is a VHCN. In this respect, the Guidelines do not follow a technological neutral approach. We think, that also wireless connections, in specific: microwave connections with very high capacity should be included in criterion 2. There are microwave technologies such as E-band microwave available which provide data rates up to 10 Gbps including high performance QoS-parameters. There is no reason why criteria 2 should be limited to fiber connectivity if there are other connectivity technologies available with same performance.

Kind regards,

**Jörg Kittl**  
Regulatory Manager

**Drei. Macht's einfach.**

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