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Subject: input on Draft BEREC Guidelines on Very High
Capacity Networks

Dear sir, madam,

NLconnect is the Dutch broadband trade association. Members include companies that build, own and operate fiber, cable, fixed-wireless and mobile networks and companies that provide services on these and other broadband infrastructures, as well as their numerous suppliers. NLconnect strives for ubiquitous high quality and high speed broadband connectivity in the Netherlands. In our view, the rollout of new fiber networks is instrumental in achieving the goals of the Gigabit Society.

We very much appreciate the opportunity to comment on the draft Guidelines. During the current coronavirus crisis, we notice more than ever before that a future-proof fiber optic infrastructure and high-quality digital applications are of vital importance for our society and the economy. Many of our members invest heavily in the rollout and maintenance of fiber optic and other high-speed broadband networks, in cities, towns and rural areas. As a society, we reap the benefits, now more than ever before.

The term "very high capacity network" is relevant for several provisions in the EEC. NLconnect has therefore read with great interest the BEREC criteria for the definition of very high capacity networks.

We understand that the definition includes both fixed-line connections with a fiber roll out at least up to the multi-dwelling building, wireless networks with a fiber roll out up to the base station as well as networks that comply with the QoS parameters mentioned in criteria 3 and 4. These criteria must be achievable under usual peak-time conditions. We are of the opinion that the definition should be as technology neutral as possible. The QoS parameters serve this purpose.

The QoS parameters fit in well with the potential performance of most advanced broadband networks that are present in the Netherlands, such as FttH, cable, fixed-wireless, wireless and mobile networks. Although it is not necessary that the network actually offers a service that fulfills the parameters to be regarded as a very high capacity

network, a growing number of broadband networks in the Netherlands offer such services nonetheless.

BEREC is of the view, that in case fiber is rolled out up to the multi-dwelling building it is desirable that technologies which are deployed inside the building correspond to the performance potential of FTTB, although this is not a legal requirement. We would like to comment that it is common practice in the competitive Dutch market that residential units in multi-dwelling buildings are connected with fiber or other fast techniques.

We understand that, since 5G has not yet reached mature deployment and significant penetration, BEREC intends to update criterion 4 as soon as possible and not later than 2023. We consider this a sensible intention.

In short: we see no reason to make any proposals that deviate from the proposed definition. We compliment BEREC for the given comprehensive definition and would like to express our support for the draft Guidelines.

Yours sincerely,

Mathieu Andriessen
managing director