

Body of European Regulators for Electronic
Communications (BEREC)

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**Public consultation on draft BEREC Guidelines on very high ca-
pacity networks**

30.04.2020

Dear Sir or Madam,

The Federal Association of Fiber Access Operators (BUGLAS – Bundesverband Glasfaseranschluss) represents around 150 enterprises and operators, which serve around 75 % of FTTB and FTTH customers in Germany. In this spirit BUGLAS advocates investment friendly framework conditions in which the deployment of fiber networks and associated business models can be implemented successfully.

We would like to thank BEREC for the opportunity to comment on the draft guidelines and hope that our remarks regarding fixed very high capacity networks will be taken into consideration.

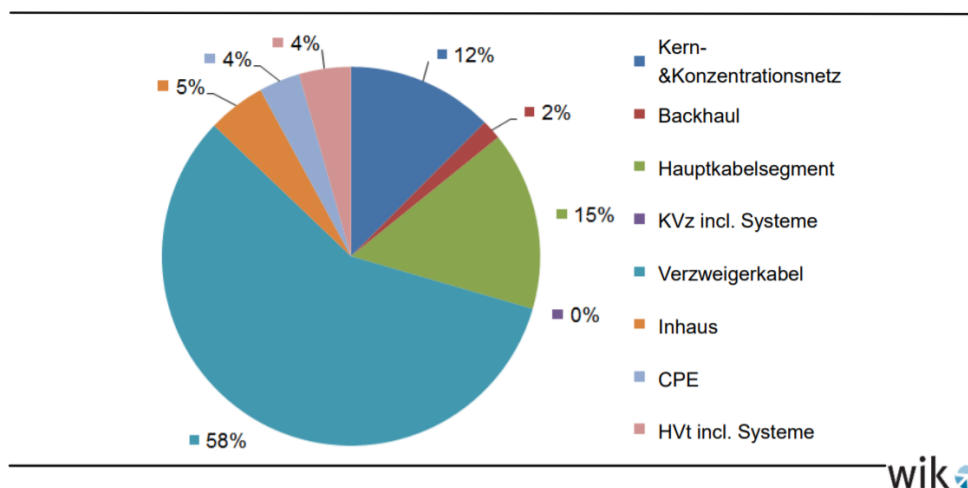
In our view the focus should be set on promoting the deployment of fixed very high capacity networks based on fiber infrastructure at least up to a multi dwelling building. FTTB and FTTH networks are by far the most technologically capable and sustainable networks and therefore should be the target of any governmental action rather than copper-based networks like FTTC and HFC or mobile networks.

Therefore, we share BEREC's approach regarding fixed wireless access (FWA) solutions. FWA networks should also need to fulfill the QoS parameters of fixed very high capacity networks to be considered as such. Since FWA products can only be considered as substitutes for fixed line products and are not used for mobile connectivity, we consider BEREC's approach as appropriate.

We fully support BEREC's general approach regarding fixed very high capacity networks. The distinction between "fiber-based" very high capacity networks and "QoS" based very high capacity networks is correct and reflects the provisions of Article 2 Nr. 2 EECC and recital 13. We understand the proposed guidelines the way that any FTTH or FTTH network is considered as a very high capacity network regardless of the respective transmission technology and fully agree with this finding. Therefore, any network providing a fixed-line connection with a fiber roll out at least up to the multi-dwelling building has to be considered as a very high capacity network without any exceptions.

Furthermore, we also agree with the "best in class"-approach chosen by BEREC to determine the QoS parameters that need to be fulfilled by a network to qualify as very high capacity network. The approach correctly reflects the relevant investment, which is the deployment of fiber up to the building. Investments in a better CPE for the use of a certain transmission technology are a comparably slight, as the following figure shows.

Abbildung 4-2: Typische Kostenstruktur eines Telekommunikationsnetzes (auf Basis FTTH PtP)



Source: WIK Discussion Paper No. 457

While an FTTC network using even the latest vectoring technology may always stay an FTTC network including its physical limitations, a FTTB network can be upgraded through a – in relation to the initial excavation costs – small investment in a new CPE. The FTTC-network can however only be further upgraded by deploying new fiber infrastructure and making it an FTTB network, which would require enormous new investments. The same applies for cable networks.

Therefore, it is correct to define the reference network as an FTTB network with the best available inhouse transmission technology, which is currently G.fast @ 212 MHz. This also creates necessary incentives to further rolling out FTTB networks in Europe and establishes a strong infrastructure fundament for the remaining investment into FTTH networks.

As a conclusion we agree with BEREC's general approach as well as with the results laid down in the draft guidelines. The draft guidelines correctly reflect the rules set down in the EECC regarding BEREC's task (Art. 82) as well as the abstract definition of very high capacity networks (Art. 2 (2)).

Yours sincerely

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