



HUAWEI CONTRIBUTION TO BEREC WP 2021 PUBLIC CONSULTATION

Huawei wants to thank BEREC for the opportunity to provide input to BEREC's Work Program for 2021. On this basis and following the structure of the draft work program, we want to make our suggestions and remarks on selected work items of the planned BEREC Work Program 2021:

Strategic Priority 1: Promoting Full Connectivity

A consistent approach to migration & copper switch off

The aim of this report – building on earlier work of BEREC – is to develop and identify a consistent approach to migration and copper switch off. Falling under the Strategic priority of “Promoting Full Connectivity”, it has to be clearly stated, that copper switch off cannot be used as a tool to promote VHCN investment, as the first strategic priority of BEREC might suggest. It is rather a question of fair competition in the context of the replacement of Wholesale products. Huawei suggests a very close interaction with stakeholders on this report in order to avoid distortions in the market and frustrated investment. It might be beneficial to involve stakeholders on several stages (e.g. two-stage consultation) to include as much as possible experience from the market.

Report on regulatory treatment for backhaul

Backhaul infrastructure is key for enabling 5G and VHCN deployment in less densely populated areas. BEREC plans to give guidance on how to apply in market analysis the relevant provisions regarding backhaul also with a view to the review of the recommendation of relevant markets by the European Commission. This is of high relevance for the market to facilitate deployment. We would suggest distributing the planned questionnaire not only to NRAs but also to major stakeholders to get a fuller picture e.g. on technological developments that could impact the assessment of the competitive landscape in the market. Huawei would be more than happy to contribute with its expertise in such a questionnaire. However, any additional regulation in new markets shall be preceded by a thorough analysis demonstrating the need to address market failures.

Workshop on EMF: How best can BEREC promote science-based EMF exposure limits recommended by experts?

BEREC intends to have a conversation about how best to promote science-based EMF exposure limits so that both NRAs and National Competent Authorities may refer to this material in their relevant collateral/fact sheets/web pages on this topic. A workshop will be held contributing to identifying new challenges which could arise from 5G-only technical specificities. Huawei welcomes this important initiative as BEREC is a trustworthy, impartial, and independent organisation which can promote and disseminate science- and fact-based information on the EMF topic to European citizens. Huawei stands ready to support this workshop with expertise from around the world.

Report to enable comparable national broadband coverage indicators throughout Europe

Huawei supports this work to create comparable indicators for broadband coverage across Europe because reliable and accessible data is the basis for new innovative services, correct business decisions and consumer choice. Such data is of utmost importance for vertical industries in a 5G world. However, given the potentially broad impact of such indicators beyond the telecommunications industry, Huawei would recommend to consulting the draft report with stakeholders before publication.

Strategic priority 2: Thriving sustainable and open digital markets

Report on the Internet value chain

Huawei welcomes the planned Report on the Internet Value Chain continuing work already done by BEREC in recent years. Open, fair and non-discriminatory markets along the whole digital value chain will benefit not only European citizens but all players along the value chain driving innovation. BEREC should take a very general and holistic approach with this report to identify the key players along the whole value chain and their practices influencing competition, innovation and investment.

Cooperation with EU institutions and institutional groups

International cooperation

In 2021, BEREC plans to continue to engage in a dialogue with NRAs based outside the EU, and with international regulatory networks, policymakers and institutions in the field of electronic communications. To that end, BEREC will develop a medium-term Strategy and a multi-annual Working Programme related to its international activities, in which it evaluates its current international commitments and defines what type of cooperation and engagement could be envisaged with each of its international partners, in a transparent manner. Huawei welcomes this initiative, given the global nature of communication and the underlying value chains. Huawei wants to encourage to deepen the dialogue with Chinese institutions in the field of communication, in order to foster mutual understanding and exchange of best practises. The BEREC study trips to China in 2015 and 2019 should only have been a starting point in a regular exchange of experience and constant dialogue with Chinese institutions, like the China Academy for Information and Communication Technology (CAICT), China operators or suppliers as well as digital service providers.

BEREC ad hoc work

Ad hoc work relating to network security and cybersecurity

As outlined in the Work Programme 2021 the BEREC ad-hoc group on 5G Cybersecurity (5GCS) is a facilitator to help NRAs in their state of preparedness. It also provides a forum for smooth collaboration between the NRAs by sharing expertise and information.

The work of BEREC on 5G Cybersecurity is very much welcome by Huawei. BEREC can contribute to this ongoing heated debate, that is full of misinformation and misperception with independent, unpolitical and unbiased advice. We want to encourage BEREC to promote open and transparent dialogue and keep an open mind on this very geopolitical issue, harming Europe's endeavours for a fast adoption of 5G. We would also encourage BEREC to publish its work on Cybersecurity to contribute to a fact-based discussion.

BEREC mandatory tasks in line with EU legislation

Sustainability: assessing BEREC's contribution to limiting the impact on the environment

BEREC plans to further develop BEREC's fundamental knowledge about different aspects of sustainability in the telecom sector. This includes methodological (or lack thereof) elements that are available to characterize the impact of the digital sector on the environment (in particular in coordination with the work being done by the European Commission). Specific emphasis will be given to energy efficient and circular economy solutions, and to indicators to monitor environmental impacts and assess improvements made by the sector.

Huawei is of the opinion that BEREC should put a strong emphasis on studying how the advanced ICT technologies like fibre and 5G could contribute to a dramatic reduction of carbon emission. BEREC can also contribute by raising awareness and setting the right incentives for climate neutral ICT technologies. Huawei therefor welcomes the planned BEREC report identifying areas of regulatory intervention available to NRAs to maximize their positive contribution on the environment.

Huawei has constantly improved its products and technologies to be more energy efficient to reduce carbon emission and to contribute to environmental sustainability. We are more than happy to share our experience and the potential of technologies in achieving a substantial reduction of the carbon footprint.