

**PRYSMIAN GROUP'S RESPONSE TO THE CONSULTATION ON
BEREC WORK PROGRAMME FOR 2023**

7 November, 2022

As the leading European optical cable producer, operating 48 plants across 15 member states, Prysmian welcomes the opportunity to provide input as part of the consultations on the 2023 BEREC Work Programme for 2023.

At Prysmian, **we pride ourselves for our support towards making Europe fit for the digital age and digitally-sovereign**. As such, we wish to share our vision, perspective, and expertise towards achieving these goals, providing a meaningful contribution to BEREC's work.

First, **we strongly support BEREC's prioritisation of achieving full connectivity and secure 5G rollout in 2023**. Prysmian continuously improves performance, resilience, and overall sustainability of its optical fibre to ensure Europe has very own capacity to meet 2030 digital targets in time. Among others, this is why we have recently expanded and modernised our production line in France.

Bearing this in mind, we welcome BEREC's intention to hold a **workshop on migration to VHCN networks and copper switch-off** (1.4). The deployment of a very dense and ubiquitous optical network is a prerequisite to ensure a smooth transition from legacy infrastructures. We agree that the copper switch-off benefits the environment, consumers, and operators. However, the **progress in this area remains fragmented**¹ across the EU. The stakes are high because legacy networks mean service disruptions, inability to deliver certain services in the future, high maintenance costs, and unsatisfied users. Therefore, **the planned workshop should reflect on the best practices to future-proof networks besides focusing on the needs of the end-users**.

Lastly, we strongly support BEREC's intention to work on **ICTs sustainability in the context of the European Green Deal** (2.4). The twin transition is about the long-term sustainability of the EU economy, which can be only achieved if there are no strategic dependencies, including connectivity infrastructure. **Future-proof networks should be built of high-quality components** ready for the technological evolution of the next 20 years. It is also **important to ensure sustainability of the construction process**, supply chains and use of less invasive parts such as the bend-insensitive fibre. Therefore, we believe both regulators and policymakers should be equipped with reliable market data and insights from the industry to support their related activities. We at Prysmian, want to **signal our readiness in providing relevant examples and information in support of BEREC's works on ICT sustainability**.

We once again thank BEREC for the opportunity to provide input on its Draft Work Programme for 2023 and look forward to future cooperation in realising a Europe fit for the digital age.

¹ FTTH Council Europe: Copper switch-off: European experience and practical consideration (update 2020)