



## ATC EUROPE

American Tower Corporation (ATC) welcomes the opportunity to comment on the public consultation on the draft BEREC Work Programme 2023. As a global provider of wireless communications infrastructure operating over 30,000 sites in Europe, we embrace the work that BEREC is planning to conduct in the tower industry.

### 1. General comments

The relevance of independent wholesale wireless infrastructure providers (independent TowerCos) for the European digital sector has been growing in the past years, particularly given the ongoing delivery of benefits and advantages for customers (particularly for Mobile Network Operators – MNOs), the wider sector, and ultimately end users.

As evidenced by the EWIA/EY report on the economic contribution of the European tower sector<sup>1</sup>, independent TowerCos significantly support the roll-out of mobile networks, whether it be through the financing or the construction of these roll-outs. Independence fosters the neutral host model that enables and facilitates co-location and mobile infrastructure sharing, thereby reducing MNOs costs, improving coverage and reducing consumer prices. In addition, outsourcing of the ownership and maintenance of passive infrastructure to TowerCos creates substantial efficiency gains for MNOs which allow them to provide wireless coverage at lower cost, given that it frees-up capital that can be re-invested to improve coverage and further accelerate 5G expansion in Europe.

Overall, independent TowerCos support the EU's Path to the Digital Decade. They enable more efficient and effective network deployment, and thereby set the stage for ensuring "Gigabit for everyone, 5G everywhere" – this should be particularly taken into account by BEREC in future work, considering the EU's strategic importance of 5G roll-out.

### 2. Study on the evolution of the competition dynamics of tower and access infrastructure companies not directly providing retail services

ATC welcomes BEREC's increased focus on the tower industry, seen through the study on the evolution of competition dynamics in the sector. To ensure that an accurate picture of the dynamics and structural features of the TowerCo market is produced through the report, we trust that the following will be taken into account:

- Distinction between (MNO-) dependent and independent TowerCos: The report should account for the differences in terms of efficiency gains and openness between dependent and independent TowerCos. Both have significant implications for the realization of the neutral host model and thus for driving tenancy ratios and coverage, as their co-location and network sharing abilities and incentives inherently differ.

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<sup>1</sup> EY-Parthenon, The economic contribution of the European tower sector, February 2022; report prepared for the European Wireless Infrastructure Association (EWIA): [Link](#)



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- Complete view of all relevant ecosystem: As the sector is diverse and multifaceted, BEREC should investigate the wider ecosystem. Therefore, it should particularly take into account the structure and role of MNOs, public and private facility (land, buildings) owners, and land aggregators, which increasingly influence prices and availability of land.

### **3. Regulatory considerations**

As for the regulatory environment we wish to stress that special attention should be given to the difficulties and hurdles faced by TowerCos and MNOs in rolling out passive infrastructure to support connectivity, particularly 5G networks. In that regard, permitting procedures and access to public and private facilities are particularly important, as they need to be sped up and facilitated to enable the European goals of ensuring “Gigabit for everyone, 5G everywhere”.

The ongoing and lengthy revision of the Broadband Cost Reduction Directive (BCRD) can thereby serve as a critical vehicle to achieve this but needs to be revised effectively and swiftly. The revision should therefore look at EU-wide harmonization (i.e., transforming the Directive into a Regulation) to stop and cure fragmentation within EU’s digital sector. Permitting procedures should be sped up and facilitated (e.g., through digitization and tacit approvals) to allow swifter network deployment in both urban and rural areas. Moreover, access to private and public facilities should be enabled and facilitated to allow improved coverage and “5G everywhere”. Finally, equal rights between TowerCos and MNOs (vis-à-vis permitting authorities) by reducing existing regulatory discrepancies should be ensured, which would additionally boost network deployment and time to market.

### **About ATC**

American Tower is global provider of wireless communications infrastructure operating over 223,000 sites across the world, on 6 continents and in over 25 countries. In Europe, the group has over 30,000 sites four countries and has become a trusted partner for a number of European stakeholders, particularly MNOs and local governments.