

Response to public consultation on BEREC 2023 Work Programme

European Wireless Infrastructure Association – EWIA

About us

We are the **European Wireless Infrastructure Association**, the European trade association of wholesale wireless infrastructure providers. Our members invest in and operate wireless infrastructure essential to the delivery of mobile voice, wireless broadband and other wireless networks.

EWIA is a well-established presence in Europe with **9 members operating across 16 European countries** who develop, acquire and operate communication towers together with investment in the fibre-connected small cell networks in buildings and on city streets needed for 5G. Together, our members have invested and operate over €100bn of wireless infrastructure assets globally and operate a portfolio of over 150,000 assets in Europe, raising the share of independent wireless infrastructure in Europe to 35%.

EWIA advocates policies that **encourage the network infrastructure investment and deployment**: this is necessary to make advanced wireless broadband available everywhere for consumers, businesses, health care, public safety and the countless other sectors that rely on always-on wireless connections. This includes ensuring better and faster connectivity in rural areas.

BEREC Work Programme 2023

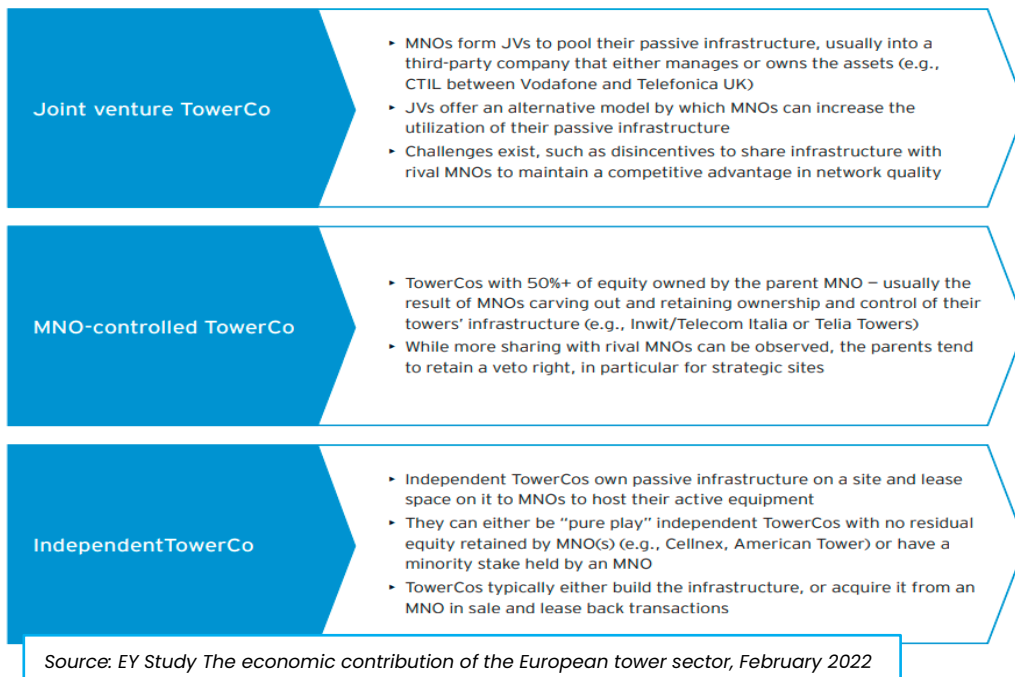
EWIA welcomes the BEREC 2023 Work Programme, in particular the study mentioned in point 1.2 on the evolution of the competition dynamics of tower and access infrastructure companies not directly providing retail services; and the reference to potential ad-hoc work on ICTs sustainability in the frame of the European Green Deal implementation and we will be open to cooperate in such studies .

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

EWIA welcomes the study mentioned in point 1.2 on the evolution of the competition dynamics of tower and access infrastructure companies not directly providing retail services. As the association representing independent wholesale wireless infrastructure providers, we are available to contribute with information about our industry and on the evolution of our sector.

In particular, it is important to make a distinction between wireless infrastructure controlled by an MNO and **independent wireless infrastructure**. As the European voice of independent wireless infrastructure, we want to emphasize that in principle independent towercos should be considered with a different regulatory lens than vertically integrated undertakings as they represent a different and genuine wholesale-only business model based on infrastructure sharing.

According to an [independent study](#) that was commissioned by EWIA to EY Parthenon, towerco business models differ by region but generally fall under **three broad categories**, in particular:



The different nature and market position of independent towercos was also taken into account by EU policymakers when drafting the **European Electronic Communications Code (EECC)**, especially in Recital 208¹ and Article 80 on wholesale-only undertakings, which provide a legal justification for applying a lighter touch regulatory regime to independent towercos as well as a definition of independence and wholesale only business.

With a very different business model to the vertically integrated operators, we are also **incentivised to maximise utilisation** of the assets, leading to higher productivity and ultimately better connectivity.

As a matter of fact, independent wholesale players invest in more substantial assets, designed for use by multiple network operators from the outset. They lower the economic threshold for rolling out new coverage with just one anchor customer and reduce the total cost of ownership for that customer by anticipating future sharing by other wireless operators. Independent neutral host infrastructure facilitates competition and allows all players to access the infrastructure easily and quickly. Sharing infrastructure results in fewer barriers to entry or expansion.

Therefore, independent neutral host infrastructure encourages smaller wireless operators and innovative new applications (e.g. fixed wireless access, Internet of Things), and in addition to the three or four mobile network operators, independent neutral host infrastructure supports hundreds of other wireless networks.

Potential ad-hoc work on ICTs sustainability in the frame of the European Green Deal implementation

EWIA also welcomes point 2.4 on potential ad-hoc work on ICTs sustainability in the frame of the European Green Deal implementation. EWIA believes that the digital and green transition go hand in

¹ Recital 208, EECC: “Network owners whose business model is limited to the provision of wholesale services to others, can be beneficial to the creation of a thriving wholesale market, with positive effects on retail competition downstream. Furthermore, their business model can be attractive to potential financial investors in less volatile infrastructure assets and with longer term perspectives on deployment of very high capacity networks.”

hand. As our model allows to transition from one tower to each operator to one tower for all operators, fewer will be needed to provide the same services, hence reducing our environmental footprint.

To better understand the sustainability impact of our sector we have also commissioned an independent study, which results should be available in early 2023. We will be keen to participate to further discussions on those issues.