



Full fibre for a digital and sustainable Europe

Response to the consultation on the 'Public consultation on the draft BEREC Guidelines on very high capacity networks'

14 April 2023

Introduction

The FTTH Council Europe (“Council”) welcomes the opportunity to give input on the ‘Public consultation on the draft BEREC Guidelines on very high capacity networks’.

The FTTH Council is an industry organisation with a mission to accelerate the availability of fibre-based, ultra-high-speed access networks to consumers and businesses. The Council promotes this technology because it will deliver a flow of new services that enhances the quality of life, contributes to a better environment and increased competitiveness. The Council consists of more than 150 member companies. Its members include leading telecommunications companies and many world leaders in the telecommunications industry (additional information at www.ftthcouncil.eu).

The Council would like to make a number of points in relation to the update of criterion four in the VHCN Guidelines.

Pushing Fibre Investments for fixed VHCN and updating the criteria for VHCN in the context of mobile networks

The FTTH Council sees the intention of the co-legislators in the EECC as being focussed on fixed networks with the intention to push fibre as deep into all networks as possible. It is of course not only fibre that is the potential network solution but fibre, and fibre performance, that acts as the baseline performance threshold against which all other network solutions must be measured. In the EECC, VHCN for mobile network is determined by the presence of fibre to the mast or antennae and is silent on the radio access technology, spectrum or associated performance¹.

Therefore, FTTH Council appreciates that in its *Guidelines* the BEREC establishes performance criteria for mobile networks and indeed, different criteria for fixed and mobile networks, which serve different end-users needs and should be seen as complementary in most instances.

In this context, the Council acknowledges the necessity to update the criteria 4 for mobile networks in light of the development of the 5G technology. We support the proposed modifications to criteria 4 performance thresholds and, in particular, the need to increase the downlink data rate. Spectrum allocation issues (e.g. in the C-Band, mmWaves) can impact on wireless networks downlink performance which may act as a constraint that makes the proposed 350 MB downlink data speed difficult to achieve in the short term.

The assessment of the VHCN parameters needs a regular update.

¹ Recital 13 “..... In the case of wireless connection, this corresponds to network performance similar to what is achievable based on an optical fibre installation up to the base station, considered as the serving location. ...”

The FTTH Council is pleased that BEREC is doing regular reviews of what constitutes VHCN and notes that work on criteria 1-3 will start next year. BEREC needs to be forward looking and network performance should not be measured in a static context as the existing technology solutions will evolve over time. It is not today's performance that is relevant but to what extent a medium is likely to be capable of delivering on the parameters that will be needed in 2025 and further. What those parameters are, or will be, will change significantly over time. In this regard, BEREC should take into account the different pace of technological development between fixed and mobile networks, and indeed the different constraints the two mediums face from a technical perspective. Indeed, the latter may require a more frequent update of the criteria.

While the FTTH Council believe that BEREC could have adopted a forward looking approach, it is pleased that the new parameters indicated in Criterion 4 are better aligned with the existing network performance of 5G networks. The deployment of such wireless networks can be important in terms of reaching full Gigabit Connectivity and will serve to push fibre deeper into existing networks and closer to the end-user.

In view of the upcoming revision in 2025, the Council invites BEREC to consider the opportunity to publish two different guidelines respectively for fixed and mobile networks.