

EWIA's response to the public consultation on BEREC Work Programme 2024

2 November 2023

EWIA welcomes the transparency provided on future BEREC activities and the opportunity to provide feedback on the [Work Programme 2024](#).

End 2024, Europe will be half-way through its course towards the Digital Decade. Wireless connectivity goals remain as warranted as when they were set, if not more. Yet, the geopolitical situation, energy availability and financial markets have changed dramatically in the past years. Securing the necessary upfront investment has become more of a challenge, necessitating efficient and sustainable business models. Therefore, EWIA members anticipate that their role in providing ubiquitous shared wireless infrastructure will become even more crucial for Europe's connectivity and sustainability.

We expect that this will be facilitated by a supportive regulatory framework, and therefore we welcome all BEREC's initiatives to engage in dialogue with stakeholders, to which we will be keen to participate.

Among the priorities in the draft BEREC work programme, we would like to highlight:

- **1.2. Workshops on ex ante regulatory experience concerning commitments, wholesale-only undertakings, and commercial agreements review.** EWIA's members have welcomed the recognition in the EECC of the specificities and benefits of the wholesale only business model. EWIA will be keen to participate in the announced workshop to share our experience and views on the independent wireless infrastructure business model.
- **2.6. BEREC Report on Infrastructure sharing as a lever for ECN/ECS environmental sustainability.** EWIA shares the view that efficient infrastructure sharing is a powerful

lever for sustainability gains. We have gathered evidence¹ that the independent towerco business model is an enabler to that end, fostering sizable economic and environmental gains simultaneously, without compromising on regulatory objectives regarding competition. EWIA has been in fruitful contacts in 2022 and 2023 with the BEREC sustainability working group regarding those matters and is looking forward to the announced report and associated public consultation.

- **6.1. Stakeholder Forum.** EWIA participated in the past annual Stakeholder Fora and wishes to express appreciation for the effort of organizing such a large-scale event again in 2024. This provides a wider view of current and upcoming BEREC activities and the opportunity through the Meet and Greet to have in-depth exchanges with working group leaders and other interested stakeholders.

About EWIA

- We are the **European Wireless Infrastructure Association** (www.ewia.org), the European trade association of independent 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 **nine members operating across sixteen 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%.

¹ By commissioning the [EY-Parthenon Study](#): The sustainability contribution of the European independent TowerCos sector (March 2023)

- 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.

