

## Feedback of Deutsche Glasfaser on draft BEREC Progress Report on managing copper network switch-off

Deutsche Glasfaser welcomes the opportunity to comment on the "Draft BEREC Progress Report on managing copper network switch-off".

Deutsche Glasfaser Group is a leading fibre broadband provider for rural and suburban areas in Germany. As a FTTH pioneer and industry leader, Deutsche Glasfaser plans, builds and operates open-access fibre networks for private households, businesses and public institutions. The company aims to roll out fibre networks across the nation, thereby contributing significantly to Germany's digital transformation. With innovative planning and construction methods, Deutsche Glasfaser is the technology leader for fast and cost-efficient FTTH deployment. Backed by experienced digital infrastructure investors EQT and OMERS, Deutsche Glasfaser is one of the financially strongest operators in the German market, with a planned total private-sector investment volume of EUR 7 billion.

The analysis shows that most of the Member States have either completed the switchover from copper to fibre yet or have at least a plan for the migration process and its timeline.

Germany is the only country where there are no plans to shut down the copper network. As one of the largest investors in the expansion of fiber infrastructure, we view this with great concern. The switchover from copper to fiber networks represents a neuralgic point for the preservation of competition and thus for the economic development of the Member States and the European Union. As a vertically integrated SMP company, the incumbent has a strong interest in using its copper infrastructure for as long as possible and in continuing to have as many customers as possible on its own network or a network under its control. The process for copper switch-off provided for in the EECC is largely in the hands of the incumbent. In order to ensure that the incumbent does not exploit its dominant market position, a regulatory concept is required from the NRA.

Therefore, we welcome the BEREC report, which at least provides some insight into the decision-making practice of the NRA in the EU. Compared to other Member States, infrastructure competition between fiber network operators is particularly high in Germany. This diversity of providers makes it necessary to make stipulations as part of a concept for the shutdown of the copper network that ensure that alternative network operators are not placed in a worse position.

Unfortunately, the BEREC report fails to address this aspect in its analysis. As it is essential for ensuring effective competition that the copper network is not only switched off in favor of the incumbent, but also in favor of an alternative network operator, we urgently suggest that the report and the query be supplemented in this regard.