

SFR' observations on the BEREC progress report on managing copper network switch-off

As requested, SFR shares its observations by following the chapters of the document.

Paragraph 7.1 Forced migration

Checking the availability of an alternative product prior to switch-off is essential on the business-to-business market. These clients have specific needs and require a multi-access offer. In France, such offers on the wholesale market take time to be put into place or are not fully efficient.

Paragraph 7.2 Migration issues

Despite the announcement in 2019 by Orange of its plan to switch off the copper network, in the public sector, some invitations to tender still ask for copper-based services, which implicates a later migration on fiber services.

Paragraph 7.3 Overall perspective

The document mentions that *"For 3 other countries (ES, SE, LU), the main learning lies in the need for an institutional and/or neutral communication, especially in order to reach some end-users in digital exclusion or reluctant to migrate"*.

There is also a need for an institutional communication in France. Currently, the neutral communication is directed by the operators and the local elected officials. But this direct communication demonstrates its limits to reach some end-users, notably the ones that are unwilling to subscribe to a fiber offer.