

PPC's response to the public consultation on "**BEREC Guidelines on the access to in-building infrastructure according to Article 11(6) of the Gigabit Infrastructure Act**"

PPC FiberGrid, the fiber optic network subsidiary of the PPC Group, was established to drive the Group's strategic expansion into telecommunications. Our mission is to develop and operate a high-speed, nationwide Fiber-to-the-Home (FTTH) network, with a target of reaching 3 million premises by 2030. This €680 million investment in ultra-high-speed broadband infrastructure plays a crucial role in Greece's digital transformation and supports the EU's Gigabit Society objectives by significantly improving the end-user experience.

We appreciate the opportunity to contribute to this consultation and share our perspective on a key issue affecting FTTH rollout: **open access to in-building physical infrastructure**.

The importance of Open Access

Access to in-building infrastructure under fair and reasonable terms is essential for the effective and competitive expansion of FTTH networks. Without it, existing infrastructure becomes a structural bottleneck, restricting competition and slowing the deployment of high-speed broadband.

In the absence of clear regulation, operators may be compelled to overbuild — duplicating in-building infrastructure at high cost — just to reach end-users. This leads to inefficient capital allocation, as funds are diverted from broader network expansion toward redundant deployments.

To prevent this, **National Regulatory Authorities (NRAs) should be encouraged to adopt ex-ante symmetrical regulation** that ensures non-discriminatory, open access to in-building infrastructure for all operators.

Our Recommendations

1. Access in Buildings Without Existing FTTH Infrastructure

- Member States should streamline the process for operators to obtain landlord permission to deploy necessary infrastructure.
- Given that FTTH in-building infrastructure constitutes a major upgrade to a building, we propose that a customer's application for an FTTH connection be treated as **implicit landlord consent**, allowing the operator to proceed with installation, including fiber cabling.

2. Access in Buildings With Existing FTTH Infrastructure

a. Infrastructure Owned by Non-ECN Operators

- We support BEREC's position (paragraph 2.5, recital 42) that where in-building infrastructure is owned by a **non-Electronic Communications Network (ECN) operator**, access should be **free of charge**.
- This obligation must explicitly include **fiber cables** installed by the non-ECN operator to ensure comprehensive access.

b. Infrastructure Owned by ECN Operators

Special regulatory attention is needed when infrastructure is owned by another ECN operator:

- **Ex-ante symmetrical regulation** must apply. Bilateral agreements between ECN operators are insufficient to ensure open access. All elements of the in-building infrastructure, including fiber cables, should be covered under a harmonized regulatory framework.
- The ECN operator must offer **non-discriminatory access** at **fair and reasonable prices** to all access seekers throughout the asset's depreciation period.
- However, we **disagree with BEREC's position** (paragraph 2.5, recital 48) on the appropriate depreciation period. Since infrastructure is typically installed to serve specific customers, we propose that the depreciation period be limited to the **average customer lifecycle of 4–5 years**.

The case of Greece

In Greece, despite strong operator support for symmetrical regulation, the NRA has not yet implemented the necessary framework. As a result:

- Operators are forced to install their own in-building infrastructure, leading to widespread overbuilding.
- Investment is diverted from national FTTH expansion to redundant infrastructure within individual buildings.
- This inefficiency undermines the strategic goal of widespread, cost-effective FTTH availability.

These measures are essential to foster competition, avoid inefficiencies, and accelerate the achievement of universal high-speed broadband access across Europe. PPC FiberGrid stands ready to support BEREC's ongoing work in this area and to contribute constructively to the development of effective regulatory solutions that enable Europe's digital future.