

**From:** [owner-gia\\_gl\\_art11@distro.berec.europa.eu](mailto:owner-gia_gl_art11@distro.berec.europa.eu) on behalf of [ΓΕΝΙΚΗ ΓΡΑΜΜΑΤΕΙΑ ΤΗΛΕΠΙΚΟΙΝΩΝΙΩΝ ΚΑΙ ΤΑΧΥΔΡΟΜΕΙΩΝ](#)  
**To:** [GIA\\_GL\\_art11@distro.berec.europa.eu](mailto:GIA_GL_art11@distro.berec.europa.eu)  
**Cc:** [ΓΕΝΙΚΗ ΓΡΑΜΜΑΤΕΙΑ ΤΗΛΕΠΙΚΟΙΝΩΝΙΩΝ ΚΑΙ ΤΑΧΥΔΡΟΜΕΙΩΝ](#)  
**Subject:** CONTRIBUTION FOR THE PUBLIC CONSULTATION  
**Date:** Monday, July 14, 2025 2:29:34 PM

---

Dear Sir/Madam,

We send the following contribution for the Public Consultation on the draft BEREC Guidelines on access to in-building infrastructure according to Art.11(6) of the Gigabit Infrastructure Act

**“In order to avoid duplication of in-building infrastructure, but also guarantee open access at fair and reasonable terms, the General Secretariat of Telecommunications and Post of the Ministry of Digital Governance proposes that a depreciation period is specified for the asset that was invested from the initial operator/installer (ECN or non-ECN operator). The depreciation period must derive from an equation that includes the number of subscribers, the years of the offered service and the initial investment. For reasons of simplicity, alternative method of calculation is the deposit of the cost of installation to the initial operator/installer by a percentage that is related to the number of operators using the in-building infrastructure (ie. 50% for 2 operators, 33.33% for 3 operators, etc). Additionally, measures for protecting private property should be considered, that relate to the legitimacy of EU measures on private companies (ie. ECN operators) benefiting from renting infrastructure from another ECN operator that has installed in-building infrastructure on a private property. A household cannot be considered as a ground for profit for the private sector and the consumer must be protected”.**

KInd Regards

**Γενική Γραμματεία Τηλεπικοινωνιών & Ταχυδρομείων**

Φραγκούδη 11 & Αλ. Πάντου  
10163 ΑΘΗΝΑ  
ΤΗΛ:210 9098900-903  
E-MAIL: [ggtt@mindigital.gr](mailto:ggtt@mindigital.gr)

**General Secretariat of Telecommunications & Post**

11 Fragoudi Str. & Al.Pantou  
10163 ATHENS  
TEL:210 9098900-903  
E-MAIL: [ggtt@mindigital.gr](mailto:ggtt@mindigital.gr)