



Association of Cable
and Telecommunication Networks
Operators in the Czech Republic, z.s.
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Dear Sirs,

Thank you for the opportunity to provide feedback to the Draft BEREC Guidelines on the access to in-building infrastructure according to Article 11(6) of the Gigabit Infrastructure Act, BoR (25) 84.

Members of the Association of Cable and Telecommunication Networks Operators in the Czech Republic (hereinafter referred to as "APKT") are from small to medium-sized companies from the ranks of cable network operators using FTTH or DOCSIS technologies. We provide electronic communications services mainly in medium-sized cities in the Czech Republic.

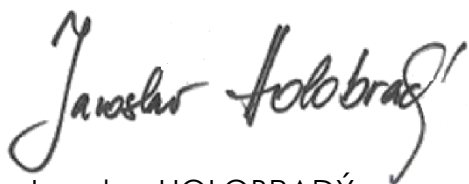
We can already see that the Regulation (EU) 2024/1309 of 29 April 2024 and the Draft BEREC Guidelines on the access to in-building infrastructure according to Article 11(6) of the Gigabit Infrastructure Act (hereinafter referred to as "Draft BEREC Guidelines") will bring a lot of changes in the construction of the gigabit electronic communications networks and welcome both these new strategic documents.



However, APKT would like to make a few comments on the Draft BEREC Guidelines:

1. The document should better describe the possibility operators of ECN network entering the land on which the buildings are located.
The aim of this will be to eliminate any obstructions that can be expected.
2. The document should include a fee covering the costs of operating and maintaining the internal distribution. Furthermore, this fee should also include any costs associated with making the physical infrastructure accessible, which should be locked.

Yours sincerely,



Jaroslav HOLOBRADÝ

Head of the Board of Directors

Association of Cable and Telecommunication

Networks Operators in the Czech Republic

