

FTTH Council Europe response on the Draft BEREC Strategy 2026–2030

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Introduction

The FTTH Council Europe welcomes BEREC's Draft Strategy 2026–2030 and its commitment to fostering competitive, innovative, and sustainable electronic communications markets across Europe. The telecom industry depends on competitive markets where operators and service providers have the incentive and ability to invest in state-of-the-art infrastructure and services. BEREC's work supports a dynamic sector that enables healthy competition, innovation, and the broadest possible choice for consumers.

The FTTH Council is an industry organisation with a mission to accelerate the availability of fibre-based, ultra-high-speed access networks to consumers and businesses. The Council promotes this technology because it will deliver a flow of new services that enhances the quality of life, contributes to a better environment and increased competitiveness. The FTTH Council consists of more than 160 member companies. Its members include leading telecommunications companies and many world leaders in the telecommunications industry (additional information at www.ftthcouncil.eu).

Response

- The relevance and adequacy of the five strategic priorities (connectivity, competition, end-user empowerment, sustainability/security/resilience, and BEREC's own capabilities).

The 5 strategic priorities are appropriate but two points are worth making. First, there needs to be a balance brought to the Commission's connectivity targets. The current targets risk being absolutist – it is almost impossible that every household in Europe will be connected to FTTH by 2030 or at any

time in the future. That is a reality and targets must be achievable and have a plan for implementation if they are to be meaningful.

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The Swedish Digital Decade country report is a good example. Their target for fixed VHCN (based on FTTH) is 98.5% because, clearly, there are certain households that are extremely hard to reach and where the cost of delivery of FTTH could not be justified. That does not mean that there will not be connectivity, simply that in very remote areas a different cost/benefit outcome may be appropriate.

Second, there needs to be a degree of caution about mission-creep. BEREC should not extend its objectives if it can be avoided. Setting a wider set of objectives risks watering down its core mission – often a more focussed objective can be more achievable. Setting too many objectives risks obscuring what the primary tasks are and should be. Other agencies can concentrate on these objectives if necessary (e.g. security).

- The identification of key market, technological, and regulatory developments.

In terms of connectivity, the advancement of satellite connectivity is a major change and the increasing use of mixed connectivity solutions is a likely feature of networks in the coming years.

Like AI and Cloud infrastructures, the FTTH Council believes these developments are complementary rather than substitutes for existing services. Satellite has significant advantages with respect to coverage but it lacks capacity to supply the mass market – on the other hand mobile networks have significant excess capacity but have more challenges in the completing coverage. Recognising the complementarity of these networks will help identify an appropriate framework for these networks working together.

The increased importance of quantum (across a series of domains) and the consequent importance of Point-to-Point solutions warrants further attention. In particular, the use of point-to-multipoint in most network topologies means that Wave Division Multiplexing or WDM needs to be considered more extensively and planned for in the short term. The FTTH Council's data suggests that Europe has

approximately 35% P2P in its network topology today but that share is falling. This critical network evolution has received little attention to date.

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Therefore a possible area for additional actions or areas of focus for BEREC might be to consider how quantum and other technologies need Point-to-Point(P2P) topology or, failing that, a technology overlay that achieves the same end (namely WDM).

- Views on BEREC's approach to institutional and international cooperation.

BEREC's approach to institutional and international cooperation is appropriate. As an independent advisor on matters that can be technical, BEREC may need to sometimes take positions on technology or market developments so that it can advise more proactively on these topics.

Comments on specific priorities

1. Priority: Promoting Full Connectivity and the Digital Single Market

We support BEREC's holistic approach to connectivity, encompassing fixed, wireless, and emerging infrastructures (including NTN and submarine cables). For the FTTH Council Europe, the acceleration of VHCN, 5G, and future 6G deployments is a primary driver of demand and innovation.

Predictable, Pro-Competitive Regulation: Predictability in regulation is crucial for long-term investments in networks, in R&D and manufacturing. The FTTH Council encourages BEREC to continue promoting a harmonised and transparent regulatory frameworks that incentivises both incumbent and new operators to invest in FTTH networks.

Copper Switch Off: The migration from legacy to advanced networks (FTTH, 5G SA, 6G) should be managed to avoid market fragmentation and ensure a level playing field for all players. By far the most important aspect and something which will be relevant throughout this strategy period is the management of Copper Switch Off.

2. Priority: Supporting Competition-Driven and Open Digital Ecosystems

The FTTH Council believes that open and competitive markets drive innovation and investment but several trends threaten this landscape:

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Market Consolidation: In-country consolidation among operators risks reducing competition and consumer choice. We encourage BEREC to monitor market concentration and ensure that regulatory actions do not inadvertently favour a small number of large players at the expense of innovation and supply chain resilience.

Facilitating Access for New Entrants: Regulatory policy should lower barriers for innovative suppliers, including those offering specialised or disruptive solutions (e.g., Open RAN, cloud-native network functions) and market business models such as Wholesale-Only and Open-Access. BEREC should also monitor the manipulation of provisions encouraging entry by SMP operators in order to undermine competition (for instance, using co-ordination mechanisms under the GIA to delay deployments or using Article 22 of the EECC to identify competitive builds).

3. Priority: Empowering End-Users

While end-user empowerment is primarily focused on consumer rights and protection, a competitive market also benefits end-users by enabling lower costs, faster innovation, and improved service quality. The biggest problem in European telecom markets is a lack of demand. This lack of demand may be linked to problems in suitable content, a lack of skills on the part of users or other factors. However, policies which seek to address the lack of demand should be prioritised.

Support for Innovation: BEREC should encourage operators to adopt innovative technologies that improve end-user experience, such as AI-driven network management, IoT, and edge computing.

BEREC should advocate for open markets and fair competition, resisting protectionist measures that could limit operator choice or increase costs for European consumers.

4. Priority: Environmentally Sustainable, Secure, and Resilient Digital Infrastructures

Page | 5 We support BEREC's emphasis on sustainability and security. FTTH solutions have a much better environmental profile than other infrastructures and should be recognised as such. Efforts by the industry to have FTTH solutions included in the EU Taxonomy should be supported by BEREC.

Technology Environmental Standards: Sustainability requirements should be outcome-based and inclusion of FTTH solutions in the EU Taxonomy will support everyone in the industry.

Supply Chain Security: Security requirements should be risk-based and proportionate, ensuring that they do not create unnecessary barriers for European suppliers or limit market competition. BEREC should facilitate dialogue between regulators, operators, and manufacturers to address evolving security threats without stifling innovation or diversity in the supply chain.

5. Priority: Strengthening BEREC's Capabilities and Continuous Improvement

The FTTH Council appreciates BEREC's commitment to evidence-based, transparent, and efficient regulation and in particular the Council appreciates the regular stakeholder meetings and engagement.

Stakeholder Engagement: The FTTH Council Europe encourages BEREC to maintain and expand structured dialogues with stakeholders, to ensure that regulatory approaches reflect the realities of the market.