

April 2025

BREKO Feedback to the Draft BEREC Guidelines on Very High-Capacity Networks

About BREKO:

As the leading German fibre-optic association, BREKO advocates for fair competition in the German telecommunications market. Its members, including over 260 network operators, are committed to deploying future-proof fibre optic networks and are responsible for more than 60% of fibre roll-out in Germany. In 2023, they invested 4.8 billion euros for this purpose.

BREKO welcomes the possibility of providing feedback to the draft BEREC Guidelines on very high-capacity networks in the context of the update to the 2020 Guidelines and according to article 82 EECC. As mentioned by BEREC in the process of the public consultation, the new version of the Guidelines on very high-capacity networks reviews the performance threshold values of criterion 3, while other criteria (criteria 1,2 and 4) remain unchanged.

First, BREKO acknowledges that the BEREC Guidelines are tied to the obligations outlined in article 2 of the EECC, stating that VHCN is “either an electronic communications network which consists wholly of optical fibre elements at least up to the distribution point at the serving location, or an electronic communications network which is capable of delivering, under usual peak-time conditions, similar network performance in terms of available downlink and uplink bandwidth, resilience, error-related parameters, and latency and its variation”.

By Article 2 EECC, BEREC has established subsequent performance thresholds in its 2020 Guidelines and has largely reconfirmed those criteria in the 2025 draft update. In this context, BREKO welcomes that BEREC has reconfirmed performance threshold 1 on QoS, especially regarding usual peak-time conditions, as this criterion contributes to ensuring high-level performance standards in terms of connectivity, which is essential for a thriving digital infrastructure in the future.

While BREKO recognises the importance for the Guidelines to remain technologically neutral in principle, it is however of the utmost importance that the deployment of fibre optic technologies is maximised within these thresholds and criteria, as their performance and energy efficiency as best in class cannot be contested and are thus essential for an innovative and resilient digital infrastructure across the EU.

In this context, we regret that fibre networks are not further emphasised in this draft report, while other technologies such as DOCSIS or G.fast are explicitly highlighted for

their potential to meet the VHCN criteria. In the frame of upgrading the technology to reach the EU's connectivity goals, it is paramount to rely on the highest possible standards for the best connectivity for the future.

To this end, we believe that criterion 1, while not being in the frame of discussion in the current consultation, and while being part of the current definition of VHCN within the EECC, should not compromise the performance of "best in class" VHCN, and thus FTTH, to ensure that end-users will ultimately benefit from the highest standards in terms of in-house connectivity.

We remain available for any further information and are looking forward to continuing collaborating with BEREC on this important topic.

BREKO is registered in the lobby register (R002215) for the representation of interests vis-à-vis the German Bundestag and the Federal Government and in the European Transparency Register (028570718529-43) for the representation of interests vis-à-vis the EU institutions.