

ecta RESPONSE

TO THE PUBLIC CONSULTATION BY BEREC

ON THE

DRAFT BEREC GUIDELINES ON

VERY HIGH CAPACITY NETWORKS

(CRITERION 3)

BoR (25) 35

29 APRIL 2025

Introduction

1. **ecta**, the **European competitive telecommunications association**,¹ welcomes the opportunity to comment on the draft BEREC Guidelines on Very High Capacity Networks - BoR (25) 42.
2. **ecta** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. **ecta** represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in fixed, mobile and fixed wireless access networks that qualify as Very High Capacity Networks (hereafter 'VHCN') and who demonstrate unique innovation capabilities.

Support for BEREC proposals relating to Criterion 3

3. Having assessed the contents (and the revision-marked version) of the draft BEREC Guidelines on Very High Capacity Networks, with a focus on the revisions to Criterion 3 (performance thresholds – applicable to fixed networks other than FTTH), **ecta** agrees with BEREC's proposals to confirm the current performances of fixed networks, and based on their evaluation, to confirm the performance thresholds values of criterion 3 originally defined in 2020.

Additional ecta remarks

4. **ecta** notes that the guidelines reassess Criterion 3 on the basis of the questionnaires sent to fixed operators in Europe. **ecta** agrees with, and highly appreciates this approach, based on real-life experience with real customers using the networks, correctly disregarding theoretical performances.

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In case of questions or requests for clarification regarding this contribution, BEREC and NRAs are welcome to contact Mr Luc Hindryckx, **ecta** Director General or Ms Pinar Serdenecti, **ecta** Regulation and Competition Affairs Director.

¹ <https://www.ectaportal.com/about-ecta>