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Full fibre for a digital and sustainable Europe

# Public consultation on the draft BEREC Guidelines on very high capacity networks

30 April 2025

**Introduction**

The FTTH Council Europe welcomes the opportunity to comment on the update to the BEREC Guidelines on Very High Capacity Networks.

The FTTH Council Europe 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 Europe consists of more than 150 member companies. Its members include leading telecommunications companies and many world leaders in the telecommunications industry (additional information at www.ftthcouncil.eu ).

The FTTH Council Europe would like to make a number of points in relation to the approach to defining equivalents to VHCN

- The FTTH Council Europe continues to believe that the intention of the legislators was to push investments in fibre and to bring fibre as close to end-users as possible. These Guidelines should express this fact more clearly.
- The exclusion of the most performant network solutions in BEREC's analysis (see paragraph 80 which excludes all fibre solutions) of VHCN equivalence results is the technical parameters for equivalence being set too low.

Finally, the FTTH Council Europe would note that the current update has to some extent been overtaken by events. As FTTH solutions are deployed and both operators and end users see the benefits in terms of performance, there is a general acceptance of the need to move to fully fibre solutions by all fixed network operators (also on operational and environmental cost grounds).

**Pushing Fibre Investments Closer to the User.**

The FTTH Council Europe reads the intention of the co-legislators in the EECC to push fibre as deep into the network as possible. It is of course not only fibre that is the potential network solution but fibre, and fibre performance, acts as the baseline performance against which all other network solutions must be measured.

Furthermore, the legal text is quite specific that in cases where the network is not FTTH, that it is not the end user experience against which the network performance is to be measured and judged but rather that it ought to be the network performance up to the distribution point at the serving location (i.e. to the building). What happens after that network point ought to be excluded from the assessment.

In practice two different parameters are being mixed and under the interpretation of BEREC particularly anomalous results arise. In terms of the physical attributes, the FTTH Council Europe is aligned with BEREC's interpretation (Criteria 1 and Criteria 2) though it is worth noting that Criteria 1 includes FTTH (wholly fibre) as the first and foremost solution.

In defining what is an equivalent to the physical definition, this in turn is a function of the physical definition and it essentially says that a network that is as performant as a network which is 100% fibre (or at least up to the distribution point at the serving location). The measurement of similar network performance is defined across the range of parameters set out in the definition. However, this measurement is only concerned with network performance up to the serving location [the building] and not the end user. On this basis, the relevant question is whether other media (such as copper,

coax copper or wireless for instance) are able to deliver comparable performance at peak-time across the six parameters to the point where they connect to the serving location. For instance, if FTTB is then completed using ADSL in the building or it is FTTB using VDSL in the building, the measurement parameters ought to be identical in the context of measuring VHCN since it only measures the performance of the medium to the serving location. The question will be whether CATV Hybrids can be said to have a similar performance across the parameters set out, if the medium that arrives to the serving location is not 100% fibre or whether wireless backhaul can be as performant as fibre to the base station.

The FTTH Council Europe believes that by relying on the end-user experience, BEREC is misinterpreting the legal text and drawing an equivalence between solutions that are materially different.