

Czech VNICTP industry association

Subject: Draft Updated BEREC Guidelines on Geographical surveys of network deployment

Submission to BEREC Consultation - Guidelines on Geographical Surveys

This submission is made on behalf of an Czech VNICTP industry association representing primarily small and medium-sized electronic communications providers, including alternative network operators and local access providers. Our members play a key role in extending connectivity, often in rural and underserved areas, and typically operate with limited administrative and financial resources.

We welcome the opportunity to comment on the draft BEREC Guidelines on Geographical Surveys and recognise BEREC's efforts to improve transparency and consistency in coverage data across the EU. However, we would like to highlight two important concerns from the perspective of smaller operators.

1. Administrative burden and impact on smaller providers The European Commission has repeatedly committed to reducing regulatory and administrative burden, particularly for smaller market players. In this context, our members are concerned that the geographical surveys create a high and disproportionate reporting burden for smaller operators.

The level of detail, geographical granularity, and data processing required by the surveys can be particularly challenging for smaller providers, which often lack sophisticated automated systems and dedicated regulatory teams. Compliance may therefore require significant manual effort, increasing costs and diverting resources away from network deployment and service improvement.

While large operators may be better placed to absorb these requirements, the impact on smaller providers risks being uneven and distortive, potentially undermining market diversity and competition.

We therefore encourage BEREC to:

- reinforce the principle of proportionality in the application of the Guidelines;
- explicitly consider simplified reporting approaches or reduced obligations for smaller operators;
- ensure that data collection requirements are limited to what is strictly necessary to achieve policy objectives.

2. Unclear definition of "available/passed" Fixed Wireless Access

(FWA) connections

Our members also wish to highlight the lack of clarity regarding the concept of an "available/passed" Fixed Wireless Access (FWA) connection. In the past and as currently

drafted, the Guidelines do not provide a sufficiently clear or operational definition of FWA availability.

In practice, FWA availability can depend on factors such as line-of-sight, signal quality, local capacity constraints, backhaul uplink capacity and installation feasibility at a specific location.

Without clear guidance, operators and regulatory or government bodies may and will apply different interpretations, leading to inconsistent reporting across providers and Member States and reducing the comparability and usefulness of the collected data. This is highly concerning especially in the case of the investment protection regarding different subsidy programs on the national level.

We therefore strongly encourage BEREC to develop, in future iterations of the Guidelines, a clear and harmonised definition of “available/passed FWA connection” for use in geographical surveys.

Such a definition should be technology-neutral, operationally realistic, and suitable for consistent application by operators of different sizes. We believe such a definition should be a target of new consultation where we are actively looking forward to participate.

Conclusion

In conclusion, while our association supports the objectives of improving coverage mapping and regulatory transparency, we believe that the Guidelines should better reflect the realities faced by smaller operators. Strengthening proportionality and clarifying key definitions—particularly for FWA—would significantly improve both the quality of the data collected and the practical feasibility of the surveys.