



ecta RESPONSE

TO THE PUBLIC CONSULTATION BY BEREC

ON THE

DRAFT BEREC GUIDELINES ON

GEOGRAPHICAL SURVEYS OF NETWORK

DEPLOYMENTS

VERSION 2.0

BoR (25) 184

6 FEBRUARY 2026

Introduction

1. **ecta**, the **European Competitive Telecommunications Association**,¹ welcomes the opportunity to comment on the Draft BEREC Guidelines on Geographical surveys of network deployments version 2.0 - BoR (25) 184 (Hereinafter 'Draft Guidelines').
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, except the additions relating to the consideration of FWA network capacity in declaring FWA coverage and the introduction of indoor coverage quality as an option

3. Having assessed the contents (and the revision-marked version) of the Draft BEREC Guidelines on Geographical surveys of network deployments version 2.0, **ecta** simply wishes to state the following.
 - (i) **ecta** overall agrees with BEREC's proposals, and namely with:
 - a. introduction of premises activated as optional indicator.
 - b. proposal of some speeds which will be declared optional for fixed broadband but quoted as "indispensable in specific state aid cases".
 - c. the proposal consisting in additional information which may be required in case of "other" (non-classified) technology.
 - d. amendments to the text to ensure consistency with the revision of BEREC VHCN guidelines.
 - e. reference being made to verification guidelines (BoR (21) 82) in the Core Guidelines which aims to strengthening the message that broadband maps need to be verified and reliability requirement promotes consistency of QoS-2 test (mobile BB).
 - (ii) In relation to the Speed Classes (Table 7, annex 2), **ecta** considers that no updates in the text are needed.
 - (iii) **ecta** however, has concerns with respect to two proposals contained in the Draft BEREC Guidelines. These regard respectively the consideration of FWA network capacity in declaring FWA coverage, and the introduction of indoor coverage quality as an option.

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

- (iv) When it comes to the consideration of FWA network capacity in declaring FWA coverage, [ecta](#) kindly invites BEREC to exercise utmost caution. The proposal implies serious risk of competitive harm for the FWA operators which are first movers in serving customers with FWA technology in their reference market. The consideration of FWA network capacity as FWA coverage would imply, in fact, the disclosure of the network capacity data. Such data constitutes extremely sensitive business confidential information, since in those markets, the survey data on this metric would be a copy of the FWA operator's real business data, unlike other metrics where all operators' data are aggregated into one dataset/value. Thus, [ecta](#) proposes to not include this specific proposal in the final text of the Draft Guidelines.
- (v) In relation to the introduction of indoor coverage quality as an option [ecta](#) wishes to underline its serious doubts from the technical standpoint. The indoor coverage metric, by its own nature, is not a reliable metric and therefore not an adequate one to be measured. The real risk of introducing such metric, even on an optional basis, is to rely on inappropriate estimates which are far from reality. In fact, the long experience reported by several [ecta](#) members show that indoor coverage is extremely hard to measure and depends on a wide range of factors, many of which are beyond the control of operators. Therefore, [ecta](#) kindly invites BEREC to re-evaluate the opportunity of introducing such indicator, even on an optional basis.

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In case of questions or requests for clarification regarding this contribution, BEREC and NRAs are welcome to contact [REDACTED], [ecta](#) Director General or [REDACTED], [ecta](#) Regulation and Competition Affairs Director.