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FTTH Council Europe response to the consultation on The draft update on the BEREC Guidelines on geographical surveys of network deployments.

February 9th, 2026.

Introduction

The FTTH Council Europe welcomes the opportunity to comment on the draft update of the BEREC Guidelines on geographical surveys of network deployments. The FTTH Council strongly supports BEREC's objective of improving the accuracy, comparability and regulatory usefulness of broadband mapping across the EU.
It is important to remember at the outset the original purpose of this provision in the EECC– that purpose was to facilitate and enable the deployment of VHCN (FTTH/B and its equivalents capable of delivering symmetrical gigabit connectivity) by identifying those areas where VHCN was not deployed, being deployed or planned to be deployed within a reasonable timeframe. In practice, these surveys have the objective of identifying areas where FTTH might be deployed in the various timeframes. The provisions of the geographical surveys and their accuracy must be considered in this context.
With this in mind, the FTTH Council think more could be done to identify addresses relying on copper and that the distinction between homes passed with FTTH/B and activated ought to be made more clearly.

Commentary

The FTTH Council Europe generally supports the proposed targeted update, which preserves continuity with the original Guidelines while better aligning the survey framework with Very High Capacity Network (VHCN) policy objectives, the BEREC VHCN Guidelines and recent implementation experience. The Council particularly welcomes the reinforcement of harmonisation where it directly underpins VHCN deployment incentives, State-Aid design and meaningful end-user information, while keeping additional reporting burdens proportionate.

Nevertheless the FTTH Council Europe invites BEREC to solve the discrepancy caused by the 'Premises Passed' definition between dedicated capacity for specific addresses in the operator database and the "above normal cost" parameter, as this will not only structurally underestimate reach and therefore copper switch-off readiness but also require operators to build and update two different databases. An alternative definition is proposed below.

FTTH Council Europe asbl

Rue de la Presse 4
B-1000 Brussels
Belgium

+32(0)460 97
info@ftthcouncil.eu
www.ftthcouncil.eu

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Premises activated and demand-side insight

The introduction of a definition of "premises activated" and its use as an optional data point for fixed broadband (paras 23, 28, 50 and 58) is both positive and timely. A critical issue as deployment increases and availability pushes past 80% for Europe as a whole, is the rate of take-up. Take-up determines the return on investment and consequently the willingness to invest and the pace of investment.
From the FTTH Council Europe's perspective, distinguishing between "premises passed" and "premises activated" helps policymakers better understand both supply-side coverage and actual take-up of very high-capacity connectivity, which is critical to assessing market failure and to calibrating demand-side measures.

The Council therefore:

- Supports the new definition of "premises activated" and its inclusion as a field at both address and grid level. However, the FTTH Council feel strongly that it should not be an optional element but that operators should be encouraged to complete the status of this metric.
- Encourages BEREC to invite NRAs/OCAs to make systematic use of "premises activated" in contexts where understanding the utilisation of FTTH and other VHCN is key, such as State aid ex-ante assessments and the monitoring of EU connectivity targets, while retaining flexibility on whether it is collected from retail or wholesale operators.
- Recommends that a separate databases be established for FTTH/B, Copper and other VHCN.

Enhanced performance metrics and alignment with VHCN Guidelines

The explicit possibility for NRAs/OCAs to require maximum upload speed and expected peak-time download and upload speeds, in addition to maximum download speed, is strongly supported (paras 50, 58, 67–69). These indicators bring the survey framework closer to the performance dimensions relevant for VHCN definition, State-Aid control and user experience, especially in an FTTH environment where symmetric or near-symmetric services are a key differentiator.

However, the FTTH Council questions what the point of measuring speeds at 30 Mbps, 100 Mbps are when the relevant (policy) metric is 'VHCN' or 'not VHCN'. The FTTH Council recommends that the speed classification be limited to either 1Gbps and above, or less than 1 Gbps. Such an approach would also be better aligned with the Digital Network Act proposal.

The Council also supports the alignment of speed calculations with the VHCN Guidelines through the requirement that QoS-1 speed indicators be calculated on the transport layer protocol payload, ensuring consistency between VHCN qualification and mapped speed classes.

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The Council encourages BEREC to highlight that for fixed networks, and especially FTTH, expected peak-time speeds (i.e. normal peak-time usage, actually experienced in the network) should be used wherever feasible in regulatory and State-Aid contexts, given their closer link to real-world performance under load.

Treatment of FWA and protection of VHCN incentives

The updated text on Fixed Wireless Access (FWA) provides useful clarifications, in particular the distinction between FWA in licensed and unlicensed spectrum, the possibility to treat FWA as part of fixed broadband for mapping, and the requirement to consider network capacity when determining FWA coverage (paras 62–64, and references to Table 2).
The Council recognises that, under strict conditions, certain FWA deployments may achieve VHCN-level performance, as reflected in the interaction with the VHCN classes and criteria.
From the FTTH Council Europe's perspective, however, it is essential that any FWA qualification as VHCN remains exceptional, evidence-based and consistent over time, to avoid undermining fibre investment incentives and creating uncertainty for both investors and public authorities.

The Council therefore:

- Supports the requirement that, for FWA to be classified in the higher VHCN classes, all performance thresholds in the relevant VHCN criteria must be satisfied for at least 95% of addresses or grid area, and that in such cases, class 3 is to be used rather than classes 2 or 4.
- Recommends that BEREC further emphasise that NRAs/OCAs should explicitly assess FWA network capacity, traffic load and long-term sustainability when accepting FWA as VHCN, and be particularly cautious where services rely on unlicensed spectrum or where mobility and nomadic use could significantly erode guaranteed fixed-like performance.

Fixed technology taxonomy and DOCSIS 4.0

The addition of a specific category for DOCSIS 4.0 in the fixed technology table (Table 2) reflects technological evolution while maintaining a clear distinction between fibre, cable and copper-based technologies. The Council agrees that the "other technologies" category is considered optional and can be replaced by explicit technology declarations required by NRAs/OCAs.
For end-users and public authorities, clarity regarding the underlying access medium remains essential to understand long-term performance, upgradability and resilience, particularly in the context of gigabit and beyond-gigabit objectives.

The FTTH Council Europe therefore:

- Supports the explicit identification of DOCSIS 4.0 and the preservation of a separate fibre category, ensuring that FTTH/B continues to be clearly visible in mapping outputs and statistics.

- Encourages BEREC to invite NRAs/OCAs to avoid over-aggregating technology categories in public outputs where this would blur the distinction between full fibre and other technologies with different performance and upgrade profiles.

Finally, the FTTH Council would highlight the issue of the end-user experience – very often it is beyond the scope of measurement. This can be justified on many grounds but principally because the experience end-users get will often depend on many factors outside the network operators' control, for example regarding available spectrum and channels for WiFi. At the same time, the experience end-users actually experience is important for network desirability and therefore take-up, and therefore deployment.

The FTTH Council sees repeatedly a feedback-loop whereby, fixed end-user experience is not measured, only connectivity, this frees spectrum and WiFi from consideration in a fixed context, resulting in any available spectrum being identified for the mobile sector (see for example the reasoning included in RSPG25-033 and RSPG25-031). Recognising the importance of end-user experience would allow a better allocation of spectrum resources in the future.

Nevertheless the FTTH Council highlights a discrepancy that the current approach of defining Premises Passed creates with the commercial "availability" databases of investing VHCN operators. These databases are used for retail and wholesale sales activities and are based on the dedicated capacity within the network deployed, attributed to specific addresses. These databases do not – and cannot – differentiate between Premises Passed with dedicated capacity within "normal distance" of the access network and Premises Passed, which may need some more effort due to longer distance to the access network or (sub-)surface conditions.

BEREC needs to adjust its definition to better reflect industry standards. The FTTH Council Europe suggests the FTTH Council Global Alliance definition of terms would be appropriate: Premises Passed: is the number of premises which an Operator has capability to connect to an FTTH/FTTB network in a service area, but the premises may or may not be connected to the network. Typically new service activation will require the installation and/or connection of a drop cable from the homes passed point (e.g. fiber-pedestal, manhole, chamber, utility-pole) to the premises, and the installation of subscriber premises equipment at the premises. This definition excludes premises that cannot be connected without further installation of substantial fiber plant such as feeder and distribution cables (fiber) to reach the property on which a potential new subscriber is located."

Mobile coverage modelling and indoor performance

The draft update to section 2.4.2, including the guidance on using mobile cell-edge coverage as a reasonable modelling approach and the option to define multiple indoor coverage classes based on assumed attenuation (paras 75, 81–82, 90–91), is a pragmatic evolution of the mobile dimension of the Guidelines. From a fixed-network perspective, realistic and credible mobile coverage and speed estimates are important to avoid overstating the substitutability of mobile

broadband for fixed VHCN, particularly in dense urban environments and deep-indoor locations.

The FTTH Council Europe:

- Welcomes the recognition that static, predominantly outdoor performance is the baseline for mobile speed classes, and that indoor coverage may be represented through additional classes if required by NRAs/OCAs.
- Encourages BEREC, in its envisaged future work on harmonised cell-load estimates and mobile speed calculation methodologies, to ensure that any assumptions used in mobile mapping do not overstate the ability of mobile networks to sustainably deliver fixed-like VHCN performance to a large share of premises, especially during peak times.

Data resolution, GIS and activated-premises layer

The Council continues to support address-level resolution as the default for fixed broadband, complemented by granular grid-based mapping for mobile and FWA, as set out in section 2.3 and Annex 1. The requirement for a unique national address database and the specification of GIS layers, including the explicit addition of "premises activated" as an inventory raw data category, are particularly welcome from the perspective of analysing FTTH penetration and targeting policies.

The FTTH Council Europe:

- Supports the strengthened emphasis on high-resolution mapping (address level for fixed, 100 m x 100 m or equivalent polygons for mobile/FWA) as essential to accurately identify white and grey areas, to design efficient fibre-deployment interventions and to avoid overbuilding existing FTTH networks with publicly funded projects.
- Welcomes the explicit mention of "premises activated" in the GIS layer description and encourages NRAs/OCAs to exploit this layer in their analytical outputs, including penetration per area and per technology, while ensuring appropriate confidentiality safeguards.

The FTTH Council believes that a detailed database of those premises which do not have VHCN should be created, specifically that database should identify (still) active copper users who will be exposed in the event of Copper Switch Off (CUSO). CUSO will create many challenges and opportunities and should be a focus for work in the coming years. Specifically the changes to Table 4 looking at the medium and technology used by address is critically important and this data should be capable of being synced with activation data to give a more complete overview of the market.

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Verification and reliability of QoS-1 data

The reference to the separate BEREC Guidelines on verification of information and the introduction of a minimum 95% success rate for QoS-2 accessibility tests within relevant subdivisions (paras 92–93) significantly strengthens the reliability of survey outputs. Reliable validation is crucial where mapping results are used to define investment-relevant boundaries, such as under Article 22(2) and for State aid area designation.

The FTTH Council Europe:

- Strongly supports the inclusion of explicit reliability requirements for QoS-1 data, backed by QoS-2 and QoS-3 measurements, as this reduces the risk of over- or under-statement of FTTH and other VHCN coverage in regulatory processes.
- Encourages BEREC to highlight that, where mapped coverage is used to exclude areas from public support or other interventions, NRAs/OCAs should consider applying stricter verification thresholds or complementary evidence to ensure that claimed VHCN coverage is robust and sustainable over time.

Communication to end-users and policy makers

The updated guidance on publication and information tools for end-users (section 2.8, including changes in paras 115 and 122) reflects the growing importance of broadband maps as decision-support tools for households, businesses and public authorities. For FTTH, accurate representation of both availability and performance differences compared with other technologies is essential to avoid confusion and to support an informed migration to fibre.

The FTTH Council Europe:

- Supports the update of the provisions on publication and the wider range of channels NRAs/OCAs may use to provide information to end-users, provided that published data remain consistent with the underlying survey definitions and classifications.
- Encourages BEREC to explicitly recommend that public-facing tools distinguish clearly between FTTH/B and other technologies, and that they present both coverage and, where available, peak-time performance information (i.e. normal peak-time usage, actually experienced in the network), to reflect the benefits of full fibre for end-users and the wider digital ecosystem.

Conclusion:

The FTTH Council Europe welcomes the proposed changes – in particular those changes to table 4 which now tracks both the medium and technology used, as well as the change to table 8 addressing activation and not just availability. While both changes are critical to the original mission and purpose of Article 22 of the EECC, they are likely to be even more important as the market shifts from deployment to activation of FTTH/B and towards Copper Switch Off.

FTTH Council Europe asbl

Rue de la Presse 4
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Belgium

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www.ftthcouncil.eu

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The FTTH Council of course remains available to work with BEREC and NRAs/OCAs in refining and implementing these Guidelines, with the shared objective of achieving accurate, comparable and investment-friendly broadband mapping that fully supports Europe's transition to ubiquitous fibre-based Very High Capacity Networks.

About the FTTH Council Europe

The FTTH Council Europe is an industry organisation with a mission to advance ubiquitous full fibre-based connectivity to the whole of Europe. Our vision is that fibre connectivity will transform and enhance the way we live, do business and interact, connecting everyone and everything, everywhere.

Fibre is the future-proof, climate- friendly infrastructure which is a crucial prerequisite for safeguarding Europe's global competitiveness while playing a leading global role in sustainability.

The FTTH Council Europe consists of more than 180 member companies.

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