

NL response to draft Updated BEREC Guidelines on Geographical surveys

Contributions should be sent preferably in English, and, in order to facilitate processing of the responses, the comments provided should clearly refer to the specific paragraphs of the document.

General comments

The Netherlands (hereafter NL) welcomes the proposed changes to the revised Guidelines since they strike a better balance between the effectiveness and proportionality of the survey. Especially with regard to the proposed amendments to make the majority of speed classes for fixed broadband optional. NL has reservations about including the new optional parameter on Number of premises activated, since they don't primarily reflect the reach of broadband networks. Instead Number of premises connected would be a better alternative (as an optional parameter). This would align with the proposed output indicators for Gigabit connectivity in relation to EU programmes and activities.¹

Comments per paragraph

Page	Paragraph	Comments
13	27	Shouldn't NCA in the last part of the below sentence read OCA instead? In case of sufficient information provided by the wholesale provider, access seekers could be released from the obligation to provide such information by the NRA/NCA.
18	50	NL welcomes the proposed amendments to make maximum upload speed and expected peak time speeds optional. NL has reservations about including the new optional parameter on Number of premises activated, since they don't primarily reflect the reach of broadband networks. Instead Number of premises connected would be a better alternative (as an optional parameter).
22	61	NL proposes to add the blue wording to the following sentence: End-users traditionally consider FWA as a substitute of "traditional" fixed line solutions as end-users at a fixed location are receiving similar services over FWA infrastructure.
22	62	NL proposes to add the blue wording to the following sentence: The FWA with licensed spectrum (for example, P2P direct connection but probably also fixed LTE/5G) usually provides access with better quality...the end-users.
22	64	NL proposes to add the blue wording to the following sentence: NRAs/OCAs may consider issues such as network capacity for FWA networks when determining FWA coverage.
23	Table 2	There is an ** at the new DOCSIS technology (see below), but an explanation underneath the table is missing. DOCSIS 4.0 on coaxial cable**
26	81	NL proposes to add the blue wording to the following sentence: Additionally, if required by the NRA/OCA, it is possible to consider multiple classes to represent indoor coverage quality, assuming attenuation levels that are representative of indoor environments.

¹ ANNEX to the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities (COM(2025) 545 final); connectivity indicators #96.

28	86	<p>For matters of clarity and consistency, NL proposes to add the blue wording to the following sentences:</p> <ul style="list-style-type: none"> - Upload Maximum Speed classes (optional) (according to Annex 2) - Download Maximum Speed classes (optional) (according to Annex 2)
31	Table 4	Please refer to our previous comments on the new optional Number of premises activated (p.18, par. 50).
45	Annex 3 Table 8	Please refer to our previous comments on the new optional Number of premises activated (p.18, par. 50).
46	Annex 3 Table 10	Please refer to our previous comments on the new optional Number of premises activated (p.18, par. 50).