

## **BEREC**

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### **Consultation on the draft BEREC Guidelines on Geographical surveys of network deployments**

BEREC has on October 10th, 2019 invited stakeholders to participate in a public consultation on the draft BEREC Guidelines on Geographical surveys of network deployment.

The Telecom Industry Association in Denmark (TI) submits the following remarks on the draft:

#### *Balance between benefits and cost is essential*

TI understands that the guidelines aims at a certain level of harmonization across the European Union. But it is important also to consider the costs any new data requirements will place on data providers. Obviously requests to data providers must be justified and proportionate in relation to the benefits gained at EU level. TI recommends that the guidelines gives room for the NRA to decide on minor deviations from definitions and formats for data collection if this balance is not in place.

#### *Data on physical infrastructure*

TI notice, that BEREC doesn't consider data on physical infrastructure (such as ducts, conduits, masts, manholes and so on) as part of the guidelines. It will thus not be mandatory for NRA to collect such data. TI strongly supports this consideration.

#### *Definitions*

Regarding definitions TI finds that in the definition on "premises passed" the timespan on 4 weeks is too narrow. TI is of the opinion that a timespan up to 3 months would be more appropriate.

#### *Reach of mobile networks*

BEREC's approach in relation to characterize the reach of the mobile network is to determine the availability of a broadband service depending on the technology served at a specific location mapping 2G, 3G, 4G and 5G offers. Then BEREC will let NRA's to decide on any other requirements. TI strongly supports this approach.

In Denmark the NRA together with the mobile network providers has developed a very ambitious model to describe mobile network coverage. It has been a both costly and very time-consuming work. The model includes theoretical simulations to estimate the signal received in each pixel alongside other assumptions also including estimates of end user experience. It would be very harmful to the telecom industry in Denmark if this major work should be redone based on new harmonized assumptions from BEREC.

Our answer to Question 4 in the guideline consultation is thus very clear. BEREC should not seek to harmonize the assumptions made by operators and NRA's throughout Europe. BEREC should only encourage NRA's to seek this harmonization at a national level.

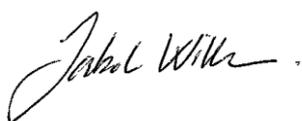
#### *Forecast data/roll-out plans*

Collection of forecast data is not mandatory according the draft guideline but is still necessary in State aid proceedings.

TI finds it very important to keep it that way. In general, it is very difficult to find credible information on rollout plans for the coming three years. There are more reasons to this.

In very competitive markets like the Danish telecom market roll out plans generally is considered as very business-critical information, which is not intended to be shared with others. But the most important reason is that do to the fierce competition companies don't make detailed roll out plans for a three years period. The companies of course have long term investment plans/budgets, but final decisions with details on which areas/addresses to cover by upgraded networks is taken with a much shorter time-horizon.

Yours sincerely,



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Director

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