

Contribution of Orange

to

BEREC Report Common Characteristics of Layer 2 Wholesale Access Products in the European Union

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- Name of the organization responding to the questionnaire: Orange
- Brief description of the role of the organization : Orange is one of the world's leading telecommunications operators with sales of 39.445 billion euros in 2014 and has 159,000 employees worldwide at September 30, 2014, including 99,800 employees in France. Present in 30 countries, the Group served 240 million customers worldwide as of 30 September 2014, including 182 million mobile customers and 16 million broadband internet customers. Under the Orange Business Services brand, Orange is also one of the world leaders in providing telecommunication services to multinational companies.

Orange is listed on NYSE Euronext Paris (ORA) and on the New York Stock Exchange (ORAN).

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Orange appreciates the goal of this report that is firstly to give an overview of the Layer 2 Wholesale Access Products (L2 WAP) in the countries where the imposed L2 WAP are available or will be imposed and secondly, to identify common characteristics of these available L2 WAP. As mentioned by BEREC, the analysis is descriptive and does not aim at being normative or recommend a best practice.

Consequently, Orange answer remains factual and only proposes some corrections of information related to wholesale products offers on Orange footprint as few incorrect information have been noticed for France, Spain and Belgium.

About France:

- Page 12 chap 4.4 CPE/Modem: "In France and in the United Kingdom, the CPE/modem will be tested by the incumbent and in Belgium the CPE/modem must be certified."

Actually in France, the tests are those of the alternative operators and run by them.

So, instead of "In France and in the United Kingdom, the CPE/modem will be tested by the incumbent and in Belgium the CPE/modem must be certified " the text could be "In the United Kingdom, the CPE/modem will be tested by the incumbent and in Belgium the CPE/modem must be certified. In France the test are those of the alternative operators and run by them".

- Page 14 chap 4.5 Bandwidth : " In Belgium and in France, symmetric bandwidth is available based on SDSL (not NGA) with 2 Mbps (FR) and several profiles up to 2.3 Mbps (BE)."

In France , SDSL goes up to 8Mbit/s for ATM and 16 for Ethernet.

So the text could be "In Belgium, symmetric bandwidth is available based on SDSL (not NGA) with several profiles up to 2.3 Mbps. In France symmetric bandwidth is available based on SDSL (8Mbits/s for ATM, 16Mbit/s for Ethernet"

- Page 29 table 7:

Line "Symmetric bandwidth": we propose the following sentence reflecting the situation in France : "The offers are 8Mb for ATM and 16Mb for Ethernet backhaul both for Business offers".

- Page 32 table 9:

Line "Bandwidth based on over booking": please note that Ethernet is uncontended and with no overbooking; the mentioned information are only related to ATM. So we propose the following:

Uncontended bandwidth	No for ATM, No for Ethernet
Bandwidth based on overbooking	Yes for ATM, No for Ethernet

About Spain:

- Page 11 chap 4.3 Availability: In Spain the L2 WAP is available for the 100% of the FTTH accesses, but only for approximately 85% of the copper accesses (an important number of Telefonica's DSLAMs are not compatible with the regulated WAP).

So we propose to modify "In Belgium, France and in Spain the L2 WAP is available for all broadband access lines (Belgium and France copper, Spain copper and FTTH) and in the Netherlands for all copper access lines" by "In Belgium and France the L2 WAP is available for all broadband access lines (Belgium and France copper,) and in the Netherlands for all copper access lines. In Spain the L2WAP is available for the 100% of the FTTH accesses and around 85% of the copper accesses".

- Page 12 chap 4.4 CPE/Modem: In Spain it is not anymore necessary the vendor of the ONT to be the same than the vendor of the OLT. Only three concrete models of ONT can be used by ANOs for WAP, and ANOs have not the right to ask for the possibility of using some other different ONT models (this is currently in revision).

We propose the following modification:

"In ~~three~~ two countries (GR, ~~ES~~, IT), the CPE/modems must meet general requirements such as:

- compatibility of the modem with the service architecture and compliance with standard interfaces (GR, ~~ES~~); or
- it must be guaranteed that the network integrity is preserved (IT).

In Spain, only three models of ONT can be used for WAP".

About Belgium:

- Page 7, paragraph "Furthermore, prices might be differentiated by bandwidth and/or quality: the fee per subscriber (both for local and regional PoH) depends on the bandwidth of the access line in some cases (AT, DK-uncontended version, GR, IT, UK), but does not in others (BE, DK-uncontended version, FR, ES). If a backhaul component is necessary (regional PoH), the price of this component depends on the backhaul bandwidth (BE, IT) or the bandwidth at the PoH (FR, ES) and may also depend on the quality (shared VLAN vs. dedicated VLAN in Belgium or different CoS-classes in France, Italy and Spain)."

Actually, in Belgium, the prices depend well on the quality. But not only 'shared VLAN vs. dedicated VLAN', they depend also from the different CoS-classes as in France, Italy and Spain.

So, we propose to add BE in the last part of the sentence: "(shared VLAN vs. dedicated VLAN in Belgium or different CoS-classes in France, Italy, Spain and **Belgium**)."