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## **Response to the BEREC Public Consultation on the draft BEREC Work Programme 2016.**

**- Non Confidential version-**

## Company Description

Founded in 1997, WIND Telecomunicazioni offers integrated mobile, fixed-line and Internet services that markets under the “WIND” brand name and the “INFOSTRADA” brand name.

A young, innovative and fast-growing company, Wind has always been committed to bringing out the best in the features that most reflect its values: a top quality network, excellent customer service and transparent and affordable pricing.

In 2010 Wind reaches the threshold of 20 million subscribers in mobile telephony and is awarded Best Customer Satisfaction for Mobile Consumer customer between telecommunications companies in Italy.

Since 2011 Wind has been part of the VimpelCom Group, is one of the world’s leading integrated TLC operators, offering voice and data services using a series of mobile, traditional and broadband technology.

In 2011, Wind wins frequencies LTE/4G and launched "Wind Business Factor", an initiative designed to support the creation of start-up and growth of innovative enterprises.

In April 2012 Wind launches "Minuto Vero" for mobile phones: the minutes included in the Wind options and plans "All Inclusive" are all priced on a per second.

In June 2015, Wind confirmed its position as third leading mobile operator in Italy with 21.4 million customers and as the leading alternative operator in Italy for fixed line communications with **2.8 million customers**, of which **2.4 million** using direct connections.

## Contact person:

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## **Introduction**

Wind welcomes the BEREC public consultation on the Draft Review of the BEREC Work Programme 2016 and appreciate the possibility to give its point of view as leading Italian Alternative Operator since the market liberalization in Italy.

In this respect, this document reflects the structure of the BEREC's document, with suggestions about those elements that are essential for a proper assessment of future regulatory mainstreams as well as those elements in the current public consultation that may have impacts on the market. Therefore, Wind invites BEREC to take into account both elements in order to evaluate their inclusion within the final document.

## **BEREC Strategic Priority 1: Promoting Competition and Investment**


Wind is of the opinion that BEREC is facing several regulatory challenges also from the European Institutions, that should be duly take into account to make a proper settlement of the next main work-stream for BEREC, in particular Wind refers to the forthcoming review of the Regulatory Framework. Today, with the emergence of new players and the increasing role of the Over The Top Player in the value chain of the Telecommunication, It is important to guarantee first and foremost a level playing field towards a reduction of LLU prices and ensure that all operators are able to compete [OMISSIS], at the same time, the new regulatory regime would guarantee the same rules for the same services provided by communication providers as well as OTT.

The LLU access obligation remains a key regulatory measure in almost all European countries, especially in those countries where CATV is not present, so were there are no wholesale "alternatives" for access seekers. In fact while in presence of Cable Operators, Incumbents Operators are forced to compete with cable networks at wholesale level, in countries like Italy and Spain the only wholesale access network is copper-based and is owned by the incumbent, therefore the main regulatory measure is LLU and it will remain LLU for a long time period, [OMISSIS]

## **BEREC Strategic Priority 2: Promoting the Internal Market**

Wind welcomes BEREC activities in monitoring the market evolution of M2M and its role in evaluating, as Wind wish for, the needs for a light regulatory approach in order to assure a level playing field for all market players creating a suitable level of competition granting long term customers safeguards both on economics and privacy issues.

Wind very much appreciates the efforts made by BEREC on mapping, monitoring and evaluating the overall telecommunication sector, in particular considering that this



include Over the Top Players. Therefore Wind welcomes the BEREC Report on OTT services and its related public consultation.

[OMISSIS]

### **BEREC Strategic Priority 3: Empowering and Protecting End-Users**

Wind welcomes the BEREC yearly Benchmark Report on MTR, FTR and SMS, at the same time encourage BEREC to extend the information gathered in these report, in particular considering at least the last 10 years [OMISSIS]

Wind proposes to introduce new benchmarks on USO:

- EU Benchmark of USO net costs (per country and for the last 10 years);
- EU Benchmark of USO indirect benefits (per country and for the last 10 years);
- EU Benchmark of USO financing with specific indication of the total amount paid by operators since the start of liberalization;

These benchmarks are useful to embrace an in-depth analysis in order to evaluate possible undue asymmetries in terms of costs in different countries, as well as to find differences in terms of indirect benefits evaluation, and finally in order to highlight eventual differences in terms of financial methods adopted per country

Wind proposes also other benchmark on:

- NGA (VULA FTTCab, FTTH) prices benchmark report
- NGA lines deployed in different countries [OMISSIS] benchmark report  
[OMISSIS]
- Mobile coverage in the different countries [OMISSIS]  
in order to understand the status of the different countries in mobile services deployment
- 700 MHz band used [OMISSIS]  
[OMISSIS]
- OTT benchmark report on volumes of Call/SMS per Customers in EU  
[OMISSIS]

