

Dear Madam/Sir,

TeliaSonera www.teliaSonera.com welcomes the possibility to comment on ERG's consultation documents on the update of Broadband market competition and Country case studies. We have only brief comments in relation to the studies on Sweden and Norway, where we provide broadband services.

Sweden belongs to the best-performing EU countries with regard to broadband penetration, annual increase in penetration rate and LLU take up. Alternative technologies are fairly widely spread. Public funded networks, owned by municipalities and accessible for broadband providers, cover more than 60 % of the households. The incumbent operator's (TeliaSonera) shares of the broadband retail market and of the DSL "market" are among the lowest in the EU. (It should be noted that the figures by January 2006 for Sweden in Tables 1.a and 1.b are not correct. The Swedish NRA will report correct figures to the ERG.) This clearly proves that the "ladder of investment" concept does not apply in Sweden. We cannot agree that it is a fruitful regulatory model in the Swedish market as indicated in the country case study. At least, it is not necessary to step on a regulated "bitstream rung" to reach the top of the stairs.

We suggest that the country study for Norway could be updated with more recent figures on the broadband market. There has been a significant growth in 2006. It should also be emphasized that LLU take up is high in the Norwegian market and continues to grow. LLU has stimulated operators to invest high up in the "ladder of investment" and it seems that the "bitstream rung" on the ladder has not been a successful regulatory component in comparison with LLU. This is not fully reflected in the country case study and should be clarified.

Best regards,

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