



To: **BEREC - Body of European Regulators for Electronic Communications**

Riga - Latvia

E-mail: Challengeareas-Consultation@berec.europa.eu

Subject: Fastweb's contribution to the BEREC-RSPG joint report on Facilitating mobile connectivity in "challenge areas"

Fastweb, the leading fixed broadband alternative operator and the second MVNO in Italy, appreciates the effort to provide a knowledge base for policy makers, and welcomes the opportunity to comment on BEREC and RSPG joint report on Facilitating mobile connectivity in "challenge areas", and is pleased to provide its feedbacks below.

Fastweb believes, as a general principle, that the promotion of coverage in the so called "challenge areas" represents an important step in achieving the Europe 2020 objectives.

In order to pursue the improvement of coverage in the challenge areas described in the report, with the goal of meeting the demand from users and public authorities, Fastweb believes that policy makers and regulators alike, should promote **technology neutral investments**, by creating a favourable ecosystem for **new players**, so as to maximise the outcome of scarce resources allocation, and unleashing the potential of innovative approaches to spectrum use.

More particularly, the issue of coverage in challenge areas brings to the light that boundaries between different types of networks in terms of services are blurring rapidly, and that all new technological solutions especially 5G, are moving towards convergent models.

Consistently, Fastweb shares the views expressed by BEREC in the report, concerning a typical weakness of mobile coverage in low density areas in terms of lack of homogeneity and of poor service in mobility use. Fastweb believes that it is important to recognise that the solutions to these problems are dependent on mobile-fixed integration, especially in view of the exponential developments on IOT and M2M services, particularly in an indoor context.

Thus, Fastweb **strongly agrees with the report** insofar it states that **indoor coverage can be addressed by deploying dedicated indoor solutions, and in first instance integrating broadband WIFI coverage offered from fixed broadband networks.**

Fastweb judges that **more transparent and accessible information of indoor coverage should be promoted**, so as to inform final users of possible issues on QoS, but at the same time enabling them to pursue the most effective solution to tackle specific (local) lack of service, taking also into account that such a measure results in an excellent way to enhance competition between operators and among different technological solutions, and more freedom of choice for the final users among different solutions.

Transparency enhancing measures should be extended to the wholesale context in which MVNOs should be allowed to explicitly inform their customers about the causes of lack of coverage or of poor QoS.



Technological innovation might bear plenty of **opportunities to complement traditional mobile coverage with fixed broadband wireless access**, especially if a set of technical conditions are met, such as the adoption of **fully interoperable IMS networks by all mobile operators**, so as to enable VoWIFI, VoLTE, (WIFI Calling).

With regard to deployment of **other dedicated indoor solutions**, Fastweb appreciates the OFCOM approach to assess **the possibility to introduce a licence exempt regime for repeaters**, with limitations exclusively related to technical issues regarding network interference. Such a measure would certainly promote the possibility for alternative players such as MVNOs to improve indoor coverage for their own customers.

Furthermore, limitations on the possibility for alternative players, such as convergent operators or MVNO with regard to **deployment of Pico and Femtocells**, jeopardize the possibility to promote better coverage, to meet specific customers' demand. Moreover, the development of new passive architectures, such as Distributed Antenna Systems, should be encouraged, also by means of promoting network sharing and fair access to spectrum, so as to foster further investments also by operators that could significantly contribute with their assets (such as fibre connectivity) to the development of new coverage or the improvement of existing ones.

Where possible, non-discriminatory measures to ensure that stakeholders enhance coverage on MNOs licenced spectrum should be promoted, so as to complement the traditional MNOs coverage (that might not have economic interests in certain areas or specific premises)

Finally, more in general, Fastweb believes that assignment and refarming of spectrum aimed at encouraging the quick rollout of 5G networks, should allow a maximum level of inclusiveness and allow the possibility for non-traditional MNO to enter the market benefiting from measures such as 5G spectrum reserves for new entrants, auctioning of small and affordable spectrum blocks and, in particular, explicit network sharing obligations and use-it-or-lose-it clauses included in licenses.

The emerging 5G standards are definitely going in the direction of allowing enhanced network slicing and other SDN solution aimed at combining the potential of different technologies and spectrum bands and eventually useful to complement scarce coverage locally.

Signed

Tiziana Talevi