

To: [PC_Geo_surveys](#); [PC_Geo_surveys_Notifications](#)
Subject: Input to Consultation on the draft BEREC Guidelines on Geographical surveys of network deployments
Date: Tuesday, 22 October 2019 11:30:16
Attachments: [image001.png](#)

Dear sirs,

My name is _____ and I am an external expert for the European Commission, currently working on the update of the Guide to Broadband Investment.

My main point is regarding the definition “normally available speed”, I would strongly modify the definition as to “the speed the end user is expected to receive 95% of the time over each given hour of the day and the year”.

That implies at most 3 minutes low-speed time per hour, as opposed to 1.2 hours per day allowed by the current definitions. The reason for that should be obvious, and it is that the current definition would leave most users below that “normally available speed” for most of the time they are actually trying to access the network (i.e. peak hours). It is utterly uninteresting to know that if the end user connected to the network when they are not at home, they would get maximum speed, don’t you agree?

Regards,



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The RISE institutes Inventionia, SP and Swedish ICT have merged in order to become a stronger research and innovation partner for businesses and society. Acreo Swedish ICT, will continue under its existing Corporate Identity Number 556534-9007. The process of changing business name is under way, but until the amendments are approved and registered by the Swedish Companies Registration Office, we will continue to write quotes, contracts, agreements and other legal documents using the current company name.

