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Vienna, 15.11.2019

Comments on the draft BEREC Guidelines on Geographical surveys of network deployments from 3rd October 2019; BoR(19) 182

Dear Colleagues,

The Austrian Federal Ministry for Transport, Innovation and Technology (BMVIT) thanks the European Commission and BEREC for the opportunity to comment on the draft "BEREC Guidelines on Geographical surveys of network deployments". Austria welcomes the steps taken by the European Commission and BEREC to create a common understanding of telecommunication data collected across Europe. Especially in light of implementing the new European legal framework into national law as well as reaching the strategic objectives for 2025, the availability of comprehensive data is essential for taking policy decisions.

Please find as follows our comments to the draft BEREC Guidelines on Geographical surveys of network deployments from 3rd October 2019.

General remarks on BoR(19) 182

1. According to 22(3) of the Code, a need may arise to provide information as to whether an area is – or is likely to be – covered by an NGA network. Also in the EU legal framework for state aid the categorization for a network serving an address as being NGA or not is important. There is a parallel between the term "NGA" in the state aid framework and the "VHCN" concept of the Code, where the latter is yet to be addressed in the state aid legal framework. Hence, the NGA criteria – as rather generally described in the state aid framework – remains important both with regard to assessing current broadband coverage and with regard to assess whether a proposed state aid project qualifies as an NGA network. Austria therefore

recommends introducing a definition of NGA as well as VHCN in the BEREC Guidelines.

2. Currently the BEREC draft focuses primarily on consumer oriented data collection. In relation to the 2025 strategic objectives of gigabit connectivity for all digitally intensive enterprises the collection of high-quality connection which are mainly available for companies would be from upmost importance. On the one hand these connections are available for shared use under certain conditions. On the other hand, this information can also be significant for the preparation of a state aid map. Austria therefore recommends developing a toolkit in order to gather this additional information in the future.

Specific remarks on BoR(19) 182

1.3. Scope of the Guidelines *p. 6 […] 12. Concerning the collection and use of data in respect of point a), BEREC distinguishes three different indicators. Firstly, the Guidelines will use QoS-1 indicators to characterise the reach and performance of broadband networks. Secondly, the Guidelines will use QoS-2 and QoS-3 indicators as a means of verifying QoS-1 data. […]*

Remark on 1.3: Austria wants to point out that QoS3 data is only valid if there is no limit by broadband product contracts. Otherwise, there is a limit by product broadband rates.

2.1 Definitions 22. p. 10 *[…] Normally available speed: The normally available speed is the speed that an end user in the address/grid could expect to receive 95% of the time over the whole day when accessing the service. The parameters should describe the capability of network. […]*

Remark on 2.1: In order to get a more realistic picture for the normally available speed of mobile services Austria proposes that the collection of peak time speed as an additional information should be discussed within the BEREC working group.

2.1 Definitions 22. p. 10-11 *[…] An operator may report a premise as passed only if, following a request from an end user, it commits to connect the house within normal connection fees, i.e. without any additional or exceptional cost if it is the standard commercial practice and, in any case, not exceeding the usual cost in the Member State, which may be defined by the NRA/OCA. Furthermore, the operator must be able to technically connect the end user, usually within 4 weeks from the date of the request. […]*

Remark on 2.1: Due to construction capacity constrains in Austria it is not possible to connect a premise within four weeks from the date of the request. Austria therefore proposes to change the period from "within 4 weeks" to "within 12 weeks".

2.3 Geographical spatial resolution of data 32. p. 14 *[…] In such situations, NRAs/OCAs may temporarily apply (at least) a 100m x 100m grid, or polygons with similar accuracy, also for fixed broadband. However, in the medium/long term, to ensure the reliability and comparability of the mapping project, in each Member State one common database with geocoded addresses should be used by both the NRA/OCA and, as far as possible, the operators. Thus, the NRA/OCA must use a single database that identifies each address or grid with a unique code […]*

Remark on 2.3: Austria is at the forefront supporting BEREC in the desire for address-based data. However, currently we are facing some major administrative barriers collecting this data. Telecom companies in Austria do not use a uniform database, which would be a necessary precondition. In order to use a common database telecom companies need to invest in their IT infrastructure. At the moment it is not clear who will bear this costs. Austria therefore will continue to use the 100m grid (which is the only one with detailed socio-economic data) for the time being until the procedure is settled (table 9 and 10 from Annex 4)

2.3 Geographical spatial resolution of data 32. p. 14 *[…] BEREC recommends that, where available, the address database identifies the locations of hospitals, schools, major transport hubs, public administration premises and highly digitalized businesses. This information may be important for the design of national broadband plans. […]*

Remark on 2.3: The geographical location of hospitals, schools, major transport hubs, public administration premises and highly digitalized businesses is available in Austria. However, as already mentioned in the general remarks (point 2), their internet connections is mainly unknown. That is because those socio-economic drivers often rely on single business solutions. Data on those connections is currently not collected. Austria therefore recommends developing a toolkit in order to gather this additional information in the future.

2.4.1.2 Technology. P. 18 *Table 1 – Technology/medium codes*

*VDSL on the copper line**	***VDSL***
*VDSL-Vectoring on the copper line**	

Remark on 2.4.1.2: This information is currently not available from the providers. From a technical point of view, providers are able to switch the technology out of the management system according to need and possibilities of the copper network. Therefore, the bandwidth should be the main indicator.

2.4.1.3 Speed Classes 58. p. 19 *[…] Further elaboration: In the future, it may be appropriate to recommend that BEREC consider the value of working on the methods to calculate speed information according to the relevant fixed network. Indeed, some NRAs/OCAs provide some specifications (with varying degrees of complexity) that operators must follow in generating their speed estimates so that their estimations follow similar rules. For example, with copper and DSL fixed networks, the distance to the street cabinet or the switching centre and the number of users impact on the speed availability. […]*

Remark on 2.4.1.3: In Austria the incumbent (only provider of a copper network) and the Federal Ministry for Transport, Innovation and Technology have agreed on a common methodology for calculating the speed. The data provided by the incumbent is used for the Broadband Atlas (www.breitbandatlas.at) as well as for the state aid map. Since the data was publicly available through the Broadband Atlas, any citizen who was not able to get the published speed from the broadband atlas had the possibility to contact the Federal Ministry. Year by year more than 1 Mio visits on the broadband atlas portal were registered and more than 300 request per year by citizens had to be verified. The Broadband Office verified since 2015 these data on a case-by-case examination with the providers. Thereby the Broadband Office could raise the quality of the data gathered in the broadband atlas significantly. Hence,

in Austria there is no need for new methods to calculate speed information. Additionally Austria is happy to share our methodology for calculating speed.

2.4.2.2 Theoretical broadband radio coverage calculation. 74 and 75 p. 23 *[…]*

> ***74.*** *The minimum assumptions which are needed as input to the theoretical calculation of speeds are the following:*
>
> *a) a reception height of 1.5 metres above the ground at each pixel*
> *b) the used GIS layers should include not only the morphology of the terrain but also the characterization of the surface and the sizes of buildings, if and where appropriate, and if the maps are already available.*
>
> ***75.*** *In order to calculate/estimate a broadband service coverage map the following two parameters should be used, as appropriate:*
>
> *c) data traffic demand on the network, based on statistical models that take into account demand for broadband services; and*
> *d) the minimum radio coverage threshold per technology and/or per broadband service.*

Remark on 74: Austria proposes to use a 10 meter height model and for characterization of the surface the Corinne Land cover classes available throughout the EU (actual CLC 2018). As a result all member states would have a unique data set.

Remark on 75 and Question 4: Statistics models are very complex (i.e. traffic simulation with Monte Carlo method). Austria therefore proposes the use of the ErlangB method, which is in comparison easy to implement, and gives a rough overview to the possibilities in a given area and a given demand. Therefore, this could approximate for the use (cell load) of a cell in a mobile network.
A verified method for coverage calculation is the HATA or Advanced HATA model that gives results that are sufficiently precise to estimate the mobile coverage and possible bandwidth for the customer.
In general, Austria recommends discussing the thresholds for different mobile technologies too. Thereby the collected data is harmonized and comparable between member states.

2.6.1 Forecasts of broadband reach 95 p. 30 *[…] For network deployments expected to be finished within the second and third year (or any subsequent years), where the deployment plans are likely to be less concrete, the granularity of the data can be lower but should be (at least) at a level of grids of 1,000m x 1,000m (or polygons achieving the same accuracy of information). […]*

Remark to 2.6.1: To be consistent in data collection and usage Austria collects forecast data general at a 100m raster level. During the implementation of the state aid program Austria has made positive experience with this data resolution.

Annex 3 – Speed classes, Table 6 […] Code 300 […]

Remark to Annex 3: It is not comprehensible why BEREC has decided to use the 300 Mbit/s category. From a technological point of view, a 500 Mbit/s classification would be preferable since it would separate DOCSIS 3.0 and DOCSIS 3.1 as well LTE-A (Rel. 11) and 5G-NR.

On all other points, Austria agrees to the proposals by BEREC.

If you have any additional questions regarding our comments, please do not hesitate to contact us.

Kind regards!

For the Federal Minister:

Hinweis	Dieses Dokument wurde amtssigniert.	
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