

Prague 21 November 2019

Response to consultation document

Draft BEREC Guidelines on Geographical surveys of network deployments

Comment on point 42 of the document

We disagree with the requirement to report both the maximum and the normal speed class per address. For a wholesale provider, the reporting of normal speed class in the sense of Regulation 2015/2120 is not feasible as it depends also on network elements outside of the scope of a wholesale service. If the requirement to report normal speeds is kept, wholesale operators should be exempt from reporting this parameter.

The reporting of parameters for both normal and maximum speeds may be incompatible with the Directive's overall emphasis on reducing the administrative burden for all operators.

Response to question 2

We do not consider any information on the location of infrastructures is a requirement stemming from art. 22. Producing such information in a standardized format would be inadequate to the goals of the article, which is to provide an overview of the availability of service (not infrastructures) and it would most certainly constitute undue administrative burden.