



## Open Fiber contribution to the public consultation on the Draft BEREC Work Programme 2021

Open Fiber welcomes the opportunity to contribute to the public consultation on the Draft BEREC Work programme 2021 (“Draft”) and expresses its overall agreement with the priority work areas identified for the next year.

As already highlighted in the context of the early call for input on the BEREC WP 2021, Open Fiber still believes that, overall, the list of priorities indicated by BEREC reflects the main issues that need to be addressed next year and is consistent with the EECC long-term objectives.

In particular, Open Fiber appreciates the introduction of the **copper switch-off process** among the other topics under the Strategic Priority n. 1 (Promoting full connectivity). It is necessary to identify a consistent approach to the copper switch-off process, which represents one of the most important incentives both to build new VHC networks and to migrate customers from the incumbent’s legacy network.

In our view, it is fundamental that a consistent European approach insists both on a pro-competitive design of the process and on the necessity to carefully monitor the ways in which incumbents work out the migration processes, in order to safeguard the alternative operators’ network/investments.

More specifically, the NRAs should guarantee that migration processes allow end customers to migrate towards the best performing VHC networks available (both incumbent and alternative operators’ infrastructures without discrimination) in order to maximise the consumer welfare. Open Fiber would also like to reiterate the importance of continuing to address the topic of the access to existing infrastructures, since it represents an essential element to build VHC networks in a timely and efficient way.

Open Fiber particularly appreciates that BEREC provided for a public consultation on the Draft of its Report on the copper switch-off process, giving all operators the opportunity to express their points of view and any concerns.

Regarding the Strategic Priority n. 1, Open Fiber would like to underline the importance of a topic that has been introduced for the first time therein by BEREC, which is the **“Report to enable comparable national broadband coverage indicators throughout Europe”** (“Report”).

As properly specified in the Draft, the BEREC Guidelines on Geographical Surveys of network deployments (phase one) do not provide detailed indications on how to aggregate grid/address information so to make national figures are comparable. That is why Open Fiber agrees with BEREC on the need to introduce this new Report, which aims to fill an existing gap by looking at possible alternatives to delivering national aggregations and revising existing DESI definitions.



In the Draft, BEREC seems to consider that only the NRAs should be part of the discussion. There is no doubt that such a Report will have a great impact on the way in which information will be collected and thus, Open Fiber agrees that the national authorities should be involved in the definition of national broadband coverage indicators.

However, Open Fiber would like to suggest that the draft Report be made available for consultation also for the market operators, as their contribution would be very useful for the purpose of the Report itself because of their relevant experience and knowledge in the field. This would also be consistent with the approach taken by BEREC with regard to the Report on copper switch-off, whose draft will be open for a public consultation.

Lastly, Open Fiber welcomes the introduction of the **wholesale replicability test** among the topics of the BEREC Programme 2022, because it represents the sole instrument that can ensure that the wholesale price charged by an incumbent operator does not exclude an equally efficient wholesale operator from the market and should take cost orientation principles into consideration.