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**Body of European Regulators
for Electronic Communications**

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LV-1050 Riga
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26th January 2021

Dear Sir or Madam,

We are a consultancy, specializing in verification solutions for the wireless telecommunications industry.

We hereby submit our feedback for the Public consultation on **BoR (20) 230 Draft BEREC guidelines on geographical surveys. Verification of information.**

5.3 QoS-2 measurements:

Paragraph 57

“QoS-2 information has the particularity that they are undertaken under a controlled environment (as opposed to data recovered from crowd-sourcing tools). This is, the tests can be carried out under certain conditions which are known to the tester. For example, for mobile broadband and drive tests, ***the type of scanners used***, the speed of the driving, the specific geo-coordinates and times of the measurements are known. In particular, QoS-2 campaigns carried out by the Authority or by operators under the Authority supervision can be a good means of verification.”

VP: Proposed rewording from; ‘the type of scanner used’ to; ‘the type of measurement equipment used’, as metrics acquired for QoS-2 include data throughput performance (not possible via an RF scanner) a generic term for the equipment would be appropriate.

Paragraph 59:

“However, QoS-2 measurements are costly to implement and because of this, ***the Authority should clearly define the scope of the verification exercise (area, size of the sample, time of the day, operator, technology)*** and consider a random sample of measurements, or if necessary, a more complex sample design which could guarantee (at a smaller expense), for example, that all types of areas (rural and urban) are measured or that certain areas of interest are over-represented in the sample.”

VP: In our opinion, the opportunity at this stage to clearly define a common, proportional and standardized method for the scope of geographical sampling would facilitate the collection of more harmonious datasets, enabling direct comparison of results across member states.

We would welcome the opportunity to enter into dialogue together with BEREC stakeholders to drive a solution forward for this.

Paragraph 61:

“An important point is that the data required in the Core Guidelines is not a point estimation (for example, an average or a median) but rather a declaration that a given parameter falls within a specific range in the area of interest (address or grid). These are, for example, the 6 different speed tiers in Table 7 of the Core Guidelines or for a VHCN declaration (under criteria 2 or 4 of the VHCN Guidelines), that a given variable is above a pre-determined threshold. Therefore, if any QoS2 measurements are carried out, ***the Authority should expect a sufficiently large proportion of those to abide by the conditions required for the operator declaration.***”

VP: We kindly request both elaboration and clarification of the phrase: ‘the Authority should expect a sufficiently large proportion of those to abide by the conditions required for the operator declaration’, or for guidelines to which NRAs are expected to set individual tolerances or thresholds.

Yours Sincerely,

Steven J. Edwards
Managing Director

