

Vantage Towers' response to the consultation on BEREC's draft work programme for 2024

About us

Vantage Towers AG is one of Europe's largest and most geographically diversified tower companies (TowerCos), with over 84,500 sites across 10 countries. The company is headquartered in Germany. Vantage Towers operates the passive infrastructure of mobile and other radio networks such as ground-based and rooftop towers for 4G and 5G networks. By renting space on its towers to mobile and other operators, Vantage Towers is pursuing an infrastructure-sharing model which lowers investment requirements, thereby easing the roll-out of mobile networks, including in rural areas and for transport corridors while fostering competition and having a positive impact on sustainability.

Vantage Towers would like to thank the Body of European Regulators for Electronic Communications for the opportunity to provide feedback on its Draft Work Programme for 2024 published on 5th October 2023. We appreciate BEREC's efforts to foster an effective regulation of digital markets to the benefit of citizens and businesses, and of the European economy as a whole. We hope that the following comments can serve as a constructive contribution in this endeavour.

1.8 Report on Connectivity Indicators for the Digital Decade Policy Programme

The Digital Decade Policy Programme (DDPP) remains a very relevant tool to measure the progress achieved towards Europe's digital transformation and framing the right KPIs is therefore crucial for this exercise.

In its feedback to the *European Commission's draft implementing decision setting out key performance indicators for the Digital Decade Policy Programme 2030*¹, BEREC expressed some concerns about two KPIs and in particular about No 4 – 5G coverage, which reads as follows:

"5G coverage, measured as the percentage of populated areas covered by at least one 5G network using the 3.4-3.8 GHz spectrum band. For the first 2 years, additional reporting will be done for 5G coverage regardless of the spectrum band used."

In our view, the definition chosen by the European Commission would need to be amended as we share BEREC's concerns that the restriction to specific spectrum bands is not future proof. Moreover, the geographical scope of "populated areas" would need to be aligned with existing reporting procedures.

We also would like to bring to BEREC's attention that **although the Digital Decade target foresees the 5G coverage of populated areas by at least one network, all citizens should be able to access the benefits brought by 5G.**

Reinforcing the end-user perspective

- Infrastructure sharing

We would encourage BEREC, when considering the ultimate European Commission Implementing Decision setting out key performance indicators for the DDPP, **to put an increased focus on the user**

¹BEREC's feedback to the European Commission's draft implementing decision setting out key performance indicators for the Digital Decade Policy Programme 2030 available [here](#)

perspective. This is for example the approach taken by the German Bundesnetzagentur as part of their latest suggested spectrum prolongation² in which they proposed coverage obligations alongside transport paths. Where previously the deployment of at least one network was sufficient, the NRA now stresses that all networks should provide connectivity in those areas such that an equal participation of all users is ensured.

While if transposed at the level of the European Union, this aspiration may need to be balanced with a criterion of feasibility, we would like to stress that the sharing of passive and active mobile infrastructure could contribute to achieve this objective. Indeed, **by sharing infrastructure, costs can be reduced facilitating 5G deployment in all populated areas, not only for one network but for several. This would strengthen consumer choice and competition amongst 5G networks.**

- **Electromagnetic fields exhaustion**

To ensure a seamless user experience, it is vital that all mobile network operators have the ability to deploy their networks wherever coverage is needed. At the same time MNOs need to comply with applicable national safety regulations pertaining to electromagnetic fields (EMF) when putting their antennas into operation. The process of obtaining relevant permits/site certificates varies across the Union. In some Member States, MNOs can apply for radio frequency power allocation at a potential site based on theoretical calculations of EMF emissions. These theoretical calculations don't need to be confirmed by actual measurements at the live site, which would most likely be lower than the theoretical allocation. This practice can lead to an exhaustion of the limited EMF budget of a specific site (so-called EMF exhaustion), in particular on rooftops in urban areas where antenna locations are usually built in close proximity to each other or even at the same site (i.e. collocation).

Against this background, we would like to encourage BEREC to take the EMF exhaustion issue into account either in the context of the KPIs for the DDPP or in its broader work, with a view to harmonize the underlying national permit and measurement procedures in the EU. **This would help ensuring that the limited EMF budget can be used efficiently so that the full potential of MNO collocation can be achieved without compromising on emission protection.** Citizens and businesses would in turn directly benefit from faster access to high-quality connectivity.

- **Seamless cross-border connectivity**

5G cross-border corridors along traffic routes are crucial to support a connected digital single market. More specifically, seamless cross-border connectivity has now become an integral part of the end-user experience, but its timely and efficient provision still represents a complex challenge.

Therefore, we would strongly encourage BEREC to consider, either in relation to the DDPP or as a general work item, **a KPI related to handover connectivity at border crossings of main traffic routes.** We believe that it could contribute to support an interconnected, interoperable, and sovereign digital single market, in line with one of the guiding objectives of BEREC in its Work Programme, which is the development of the internal market.

Once again, we thank BEREC for the opportunity to comment on the Draft Work Programme for 2024 and look forward to working together on ensuring Europe's leadership in the field of connectivity.

² Document available [here](#), Chapter VI, 2.c