

From: owner-pc_authorisation_ici@distro.berec.europa.eu on behalf of [Florian Damas \(Nokia\)](#)
To: PC_authorisation_ICI@distro.berec.europa.eu
Cc: [Vincent LEMAIRE](#)
Subject: [CONFIDENTIAL] Response to the consultation on the Draft BEREC Report on the general authorisation and related frameworks for international submarine connectivity
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Attachments: [image001.png](#)

Dear Sir or Madam,

We thank BEREC for the opportunity to provide our **confidential** inputs to the draft report on the general authorisation and related frameworks for international submarine connectivity.

1. **Joint ownership via consortiums**

Large content and application providers (CAPs) are mostly investing in submarine cables jointly with traditional electronic communications network (ECN) providers.

As the draft report points to market data indicating that big tech investments in submarine cables accounted for 23.5% of the overall 102 undersea cable systems during the period from 2019 to 2023, around 70% of them are deployed in conjunction with ECN providers.

There is a geographical reason to this: across the Atlantic Ocean, CAPs deploy their own submarine cables. Elsewhere, for submarine cables deployed for example through the Mediterranean, around Africa, going to South-East Asia or to India, CAPs and ECN providers (or non-EU telecommunication providers) deploy and co-own them.

There is an economic interest as well to include local telecommunication providers: to get the required permits and/or licenses for cables to be deployed.

2. **Peering ecosystems supplant ownership rule**

We believe that submarine cables which are 100% owned by CAPs, as long as peering occurs on these cables to facilitate internet services and interpersonal communications services, should be subject to the same general authorisation regime under the European Electronic Communications Code.

3. **Call for a clear EU-wide definition of submarine cables and a harmonization of authorization regimes**

We support a future review of the electronic communications regulatory framework for a clear EU-wide definition of submarine cables and a harmonization and simplification of the authorization regimes.

Best regards,

Florian Damas
Head of Policy & Regulatory Affairs
Global Policy & Market Enablement

Rond Point Schuman 6, 1000 Brussels, Belgium
Contact number: +32 477 96 05 44



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