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Feedback of

**CEBF (Connecting Europe Broadband Fund),
part of Cube Infrastructure Managers, 28-32
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to the

European Commission

on their paper titled

**“How to master Europe’s digital infrastructure
needs?”**

Introduction

The Connecting Europe Broadband Fund (CEBF) has been at the forefront of promoting Rural Open Access Networks (ROAN) since its inception in 2018. This digital infrastructure private equity fund, sponsored by public institutions (European Commission and European Investment Bank) alongside private institutional investors, has funded 10 ROAN start-ups across the EU, reaching 1 million+ households with FTTH. As the most experienced player in this domain, CEBF is committed to bridging the digital divide by providing access to reliable and affordable connectivity in underserved regions, recognizing that only FTTH ROANs can effectively deliver the necessary infrastructure for vital connectivity.

We welcome the White Paper's clarification on the definition of high-speed fixed broadband as fiber. This distinction is crucial in steering away from interim solutions that are inefficient and unsustainable. Fiber is unequivocally the future-proof broadband technology, aptly termed "The" broadband connection and a key building block for future technology roll out (example 5G).

CEBF is dedicated to contributing to the European Digital Decade by driving the deployment of fiber networks in rural areas, ensuring that every European can access high-speed broadband. Hence, we present our suggestions as a response to the White Paper.

Key suggestions

1. Accelerate Copper Network Decommissioning:

- The continued operation of outdated copper networks hampers progress. We recommend the establishment and enforcement of clear continental targets for copper switch-off. This will prevent network owners from prolonging the use of obsolete infrastructure and ensure consumers benefit from superior connectivity solutions.
- A regulatory framework that mandates the transition from copper to fiber networks is essential. This shift will not only align with environmental goals but also enhance the adoption of new services, increasing the value of fiber investments and advancing the Digital Decade goals. Furthermore, it is advised to have clear regulations related to the decommissioning of copper networks: removal and recycling.

2. Enhance Regulatory Frameworks:

- Any reform of the regulatory framework must consider its economic implications for all stakeholders. We advocate for regulations that promote ROANs, as both rural overbuilds and predatory prices lead to inefficient use of capital. Protecting incumbent operators should not justify the duplication of ROANs. Truly neutral

rural open access networks are favoring competition, leading to rural citizens having the same level of service as the ones available to city dwellers.

- Addresses the inefficiencies in the regulatory framework to simplify the bureaucratic burden related to deployment permitting.
- Scenario 10 of the White Paper's proposal for reviewing existing grants and procurement processes is critical. This review should promote private investors like CEBF, ensuring transparency and accountability in subsidy commitments and achievements.

3. Encourage Private Investment:

- Modifying key tenets of Solvency II to increase the insurance industry's capacity to invest in alternative platforms will stimulate investment in infrastructure projects such as ROANs. Promoting capital providers to invest in both greenfield and brownfield infrastructure funds will maximize long-term public value creation.

4. Enforce re-use of existing supporting infrastructure, including incumbents':

- Facilitating the access to existing supporting infrastructure (mainly ducts and poles) not only from telcos but also from non-telecom holders (at least low-tension electricity distribution companies and road operators), will accelerate the construction of ROAN while decreasing CAPEX and the environmental impact of new deployments.
- In particular, strengthening controls to enforce respect for EU regulations by telecom incumbents regarding access to their existing infrastructure is crucial. This will promote the development of ROANs and prevent biased competition based on dominant infrastructure positioning.

5. Standardize Network Integration:

- With over 200 sizable network operators in Europe, overlapping infrastructures are common. Establishing a common network standard at the continental level will facilitate integration and interconnection, reducing integration costs and promoting collaboration, thereby minimizing investment duplication.

6. Promote take-up in existing networks:

- European citizens residing in rural zones often lack the economic means to gain access to ROANs. On that basis, social tariffs at the retail level should be supported with partial subsidization of the access to ROANs to incentivize ISPs to commercially promote these services among the poorest rural communities. Introduction of programs on a local level to educate the citizens on the benefits of digitalization.


Conclusion

In conclusion, we believe that these key points will drive the modernization of digital infrastructure across our continent.

Accelerating copper network decommissioning and enhancing regulatory framework will improve connectivity and encourage investment. Modifying regulations will attract capital for infrastructure projects, while enforcing infrastructure re-use and standardization will reduce costs and environmental impact. Promoting network take-up through social tariffs and education will ensure high-quality digital services for all European citizens, fostering economic growth and social inclusion.

Yours sincerely,

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