

Public consultation on the evaluation of the State aid rules for the deployment of broadband networks

Fields marked with * are mandatory.

Introduction

Although investment in telecommunications network deployment comes mainly from private operators, EU countries also provide public support ('state aid').

EU competition controls play an important role in ensuring this public support does not harm competition (by crowding out private investment, subsidising local monopolies or discriminating against certain technology platforms), while ensuring that public support creates modern infrastructure that reduces the digital divide where commercial operators have no incentives to invest.

The **EU rules** for public spending on the deployment of broadband infrastructure are:

- The 2013 [Broadband Guidelines](#)
- the relevant provisions of the [General Block Exemption Regulation \(GBER\)](#), 2014

Taken together, these EU rules are referred to as 'the state aid rules for the deployment of broadband infrastructure'.

In addition, public support in this sector must be in line with the objectives set out in the:

- [Digital Agenda for Europe \(DAE\)](#) (2010)
- [Gigabit Society Communication](#) (targets added in 2016 for telecoms network deployment by 2025, in line with expected use, market and technological developments).

Note also that investing in connectivity to achieve the 2025 objectives is a prerequisite for the new EU digital strategy, [Shaping Europe's Digital Future](#).

Why are we consulting?

As part of our evaluation of the rules described above, we would like to know your views on whether the rules:

- have stimulated telecommunications infrastructure deployment and boosted competitiveness in the sector
- respond to both technological developments and socio-economic needs
- meet the new EU strategic objectives in [Shaping Europe's Digital Future](#).

Following the evaluation, we may make some changes (legislative or other).

A **summary of our findings** from the consultation will be [published here in Q3/2021](#).

To help us analyse your reply:

- please **keep your answers concise**
- the 'extra comments' box is limited to **3,000 characters** (unless stated otherwise), but you can include **documents** and **URLs** to relevant online content
- although you can respond '*not applicable/no relevant experience or knowledge*' to any question, please **give specific answers as much as possible** (to help us gather solid evidence).

Saving and submitting

*If you click '**Save as Draft**' (to break off and finalise your response later), **you must save the link** that you receive from the EUSurvey tool on your computer. Without it, you won't be able to access the draft again.*

After submitting your finalised response, you'll be able to **download a copy**.

Questions marked with an asterisk (*) are **mandatory**. To see how we will protect your data, read the attached privacy statement.

Contacts

[Still got questions?](#)

For **technical problems**, please contact our [CENTRAL HELPDESK](#).

You may also contact us via the following functional mail box: COMP-BBGL@ec.europa.eu

Who are we consulting?

The consultation is open to any interested public or private organisation or individual.

We are particularly interested in feedback from bodies with expertise or **experience in the broadband infrastructure sector** (industry, academia, consultancy/law firms, all levels of government and managing authorities managing as well as national regulators applying EU state aid rules).

This general consultation is complemented by the technical questionnaire available on the website of [DG Competition](#).

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French

- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Markus

* Surname

Ortwein

* Email (this won't be published)

ortwein@buglas.de

* Organisation name

255 character(s) maximum

German Federal Association of Fiber Access Operators (BUGLAS)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

156712634250-38

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |

- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania

- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon

- Canada
- Cape Verde
- Cayman Islands

- Central African Republic
- Chad
- Chile
- China

- Christmas Island
- Clipperton
- Cocos (Keeling) Islands

- Colombia
- Comoros

- Congo

- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan

- Nicaragua
- Niger
- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal

- Thailand
- The Gambia
- Timor-Leste
- Togo

- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan

- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

What is your interest and the main reason for responding?

500 character(s) maximum

The German Federal Association of Fiber Access Operators („BUGLAS“ - as per German initials) represents those enterprises and operators which push forward the FttB/H deployment in Germany. Against this background we call for investment-friendly framework conditions enabling a successful realisation of private FttB/H business models.

Please briefly describe your **activities/organisation/company** and (if applicable) the main **goods/services** you provide

500 character(s) maximum

BUGLAS represents those enterprises and operators which are already accountable for about 1.1 million FttB/H connections. Our members, among them NetCologne, M-net, Wilhelm.tel, MDCC and over 150 other enterprises, plan to connect another million further homes and enterprises directly via fiber.

What kind of services does your company provide?

- Wholesale
- Retail
- Both

What kind of technology does your company use?

- ADSL/SDSL/HDSL
- VDSL
- VDSL + Vectoring
- G.Fast
- Coax DOCSIS 1.x/2.x
- Coax DOCSIS 3.0
- Coax DOCSIS 3.1
- 3G
- 4G/LTE
- 5G
- FWA
- FTTH
- FTTB
- FTTC
- other

If other, please specify

1000 character(s) maximum

*** Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Questionnaire

This consultation relates to the EU state aid rules for deploying broadband infrastructure – namely the Broadband Guidelines and the relevant parts of the General Block Exemption Regulation (*unless otherwise specified*).

Section 1 – Effectiveness

To what extent have the rules met their objectives?

1. What is your assessment of state aid policy on broadband infrastructure deployment in general?

- Very good
- Good
- Neutral
- Not so good
- Very bad
- Not applicable/no relevant experience or knowledge

Please explain

3000 character(s) maximum

For the broadband deployment, especially in rural areas of Germany, funding programmes play an important role. Thus, the design of the state aid rules has a significant impact on the broadband deployment in Germany. A few weeks ago, the funding programme for "grey" areas was notified by the European Commission.

BUGLAS generally appreciates the European framework scheme for state aid programmes in the context of broadband deployments. In the past, the state aid rules have provided guidance for the German broadband deployment. However, the principle of technology neutrality in practice turned out to incentivise the funded deployment of interim solutions like FttC-infrastructures with vectoring. To take into account the technological progress of the last decade and the Gigabit Communication, especially the NGA-definition should be replaced by a forward-looking definition. Instead of a distinction between three areas, the revised state aid rules should only contain a distinction between areas where a FttB/H infrastructure already exists ("black") and where this is not the case ("white").

The principle of technology neutrality in practice turned out to be inappropriate, since until 2018 the FttC-deployment with vectoring was eligible in Germany. Thus, Deutsche Telekom benefited from vectoring deployment until the German government in 2018 limited eligibility to deployments of gigabit-capable network infrastructures. Because vectoring is an interim solution, it is foreseeable that former FttC-funding areas will need a second funding programme, replacing the FttC-infrastructure by FttB/H-infrastructure. On ground of the doubled bureaucratic burden as well as on ground of the repeated use of public resources, the principle of technology neutrality yields a significant macroeconomic inefficiency of funding programmes in Germany. Thus, to prevent future funding programmes from such inefficiencies, the principle of technology neutrality should be critically reviewed.

In order to classify networks, the current state aid rules basically consider download rates. However, in the light of the increased demand for real-time communication between users and machines, a forward-looking network classification should also reflect the increased importance of the upload rate, of technical parameters (i.e. latency period or package lost rate) and of reliability and robustness parameters.

These parameters can only be reliably met by FttB/H-networks. That's why it is prospectively necessary that all areas without an existing or planned FttB/H-infrastructure will become in general eligible.

Further information can be abstracted from our response to the public targeted consultation.

For queries, please do not hesitate to contact us.

2. To what extent have the Broadband Guidelines achieved the following objectives?

Objective 1. Supporting the rapid deployment of broadband infrastructure, helping reduce the '*digital divide*':

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|---------|-----------|---------|------------|---|
| | | | | | |

| | | | | | |
|---|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| a. Facilitating the deployment of broadband infrastructures. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Bringing connectivity to low population density, rural and remote areas. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Addressing market failures or major inequalities. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Providing higher quality services at affordable prices. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| e. Supporting investments in line with EU common objectives, as specified in the Digital Agenda connectivity targets for 2020: (i) all Europeans have access to much higher internet speeds of above 30 Mbps and (ii) 50 % or more of European households subscribe to internet connections above 100 Mbps. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Objective 2. Limiting distortion of competition:

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|-----------------------|----------------------------------|----------------------------------|-----------------------|---|
| a. Protecting existing investment. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Protecting future investment plans. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Promoting competition in the electronic communication sector for the market (via competitive selection procedures). | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Promoting competition in the electronic communication sector in the market (via wholesale access rules). | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Objective 3. Transparent decision making

| | Totally | Partially | Neutral | Not at all | Not applicable/no relevant experience or knowledge |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|--|
| Are the Broadband Guidelines clear? | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Do the Broadband Guidelines provide sufficient guidance? | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3. To what extent has the General Block Exemption Regulation specifically contributed to the following objectives:

Objective 1. Supporting the rapid deployment of broadband infrastructure, helping reduce the 'digital divide':

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|---|-----------------------|-----------------------|-----------------------|-----------------------|---|
| a. Facilitating the deployment of broadband infrastructures. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Bringing connectivity to low population density, rural and remote areas. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c. Addressing market failures or major inequalities. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Providing higher quality services at affordable prices. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| e. Supporting investments in line with EU common objectives, as specified in the Digital Agenda connectivity targets for 2020: (i) all Europeans have access to much higher internet speeds of above 30 Mbps and (ii) 50 % or more of European households subscribe to internet connections above 100 Mbps. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Objective 2. Limiting distortion of competition:

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|-----------------------|-----------------------|-----------------------|-----------------------|---|
| a. Protecting existing investment. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b. Protecting future investment plans. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| c. Promoting competition in the electronic communication sector for the market (via competitive selection procedures). | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d. Promoting competition in the electronic communication sector in the market (via wholesale access rules). | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Objective 3. Transparent decision making

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|-----------------------|-----------------------|-----------------------|-----------------------|---|
| Are the rules in the General Block Exemption Regulation clear? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Do the rules in the General Block Exemption Regulation give sufficient guidance? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

4. The General Block Exemption Regulation sets conditions for **aid measures to be exempted from the obligation to be notified** to the Commission. To what extent do you agree with the following statements on those eligibility and compatibility conditions?

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|-----------------------|-----------------------|-----------------------|-----------------------|---|
| The conditions for broadband deployment in the Regulation are appropriate and justified. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The conditions for broadband deployment in the Regulation are easy to implement. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

5. Regarding the different activities listed below, **have you faced any barriers** in deploying broadband infrastructure? They are related to:

| | Yes | No | Not applicable/no relevant experience or knowledge |
|--|----------------------------------|-----------------------|--|
| 1. Administration related to State aid assessment | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 2. Administration related to national procedures | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 3. Due diligence/feasibility study | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 4. Designing the deployment & technical assistance | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 5. Mapping | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 6. Public consultation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 7. Competitive selection process/ Tender | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 8. Civil engineering/construction specifications | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 9. Rights of way, permits, etc. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 10. Wholesale access products and price specifications | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 11. Project management | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 12. Information sharing among public administrations | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 13. Legal actions/ challenges | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 14. Marketing | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 15. Transparency / access to documents | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 16. Other | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples
















3000 character(s) maximum

Vectoring decisions by the German NRA (BNetzA)

6. Please give a weighting from 1 to 5, depending on the size of the barrier (1 for least obstructive and 5 for most obstructive)

1. Administration related to State aid assessment



| | |
|--|---|
| 2. Administration related to national procedures |  |
| 3. Due diligence/feasibility study |  |
| 4. Designing the deployment & technical assistance |  |
| 5. Mapping |  |
| 6. Public consultation |  |
| 7. Competitive selection process/ Tender |  |
| 8. Civil engineering/construction specifications |  |
| 9. Rights of way, permits, etc. |  |
| 10. Wholesale access products and price specifications |  |
| 11. Project management |  |
| 12. Information sharing among public administrations |  |
| 13. Legal actions/ challenges |  |
| 14. Marketing |  |
| 15. Transparency / access to documents |  |
| 16. Other |  |

Please explain and give examples

3000 character(s) maximum

7. Have there been any **unexpected results** after implementing the requirements set by the State aid rules for the deployment of broadband infrastructure?

- Yes
- No
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

8. To what extent have the state aid rules for the deployment of broadband infrastructure led to more **effective State expenditure** (better targeted State intervention that delivers the desired objectives) – compared to a situation before entry into force of the Broadband Guidelines in 2013 and General Block Exemption Regulation in 2014.

- Totally
- Partially
- Neutral
- Not at all
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

9. The current General Block Exemption Regulation requires the use of a **transparent and non-discriminatory selection procedure**, precluding a public authority from deploying and managing the network directly (or through a fully-owned entity). Is it appropriate?

- Yes
- No
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

10. Do the provisions of the state aid rules for the deployment of broadband infrastructure concerning requirements for transparency (such as publishing information on the aid on a centralised public website) ensure **adequate access to the information**?

- Yes
- No
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

Section 2 – Efficiency

Were the administrative costs involved proportionate to the benefits?

Were the state aid rules more or less efficient than before 2013, a period when support in this sector was regulated only by the [2009 Broadband Guidelines](#) (the Broadband Guidelines and the relevant parts of the General Block Exemption Regulation entered into force in 2013 and 2014, respectively).

Were the costs of complying with the state aid rules proportionate to the benefits of having them? Have the rules ensured efficient State expenditure?

11. Based on your experience, to what extent have the requirements set by the state aid rules for the deployment of broadband infrastructure led to more efficient **State expenditure** (timely and less costly intervention) than in 2009-13, when support in this sector was regulated only by the 2009 Broadband Guidelines)?

- Totally
- Partially
- Not at all
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

12. Can you estimate the **level of the cost generated** by applying the **2013 Broadband Guidelines**?

| | < 0.5% | < 1.0% | < 2% | < 5% | < 10% | >10% |
|-----------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Cost as % of aid amount | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Cost as % of project budget | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

13. Can you estimate the **level of the cost generated** by the application of the **General Block Exemption Regulation**?

| | < 0.5% | < 1.0% | < 2% | < 5% | < 10% | >10% |
|-----------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Cost as % of aid amount | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Cost as % of project budget | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

14. To what extent have the **2013 Broadband Guidelines reduced the administrative burden** (compared to 2009-13, when the sector was regulated only by the 2009 Broadband Guidelines)?

- Totally
- Partially
- Not at all
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

15. To what extent have the requirements set by the **2014 General Block Exemption Regulation reduced the administrative burden** (compared to 2009-13, when the sector was regulated only by the 2009 Broadband Guidelines)?

- Totally
- Partially
- Not at all
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

16. **Cost of applying the rules** – do you think that, compared with the [2009 Broadband Guidelines](#), the new (2013) Broadband Guidelines have led to:

- a reduction of the cost by < 30%
- a reduction in cost by >30% <50%

- a reduction in cost by >50%
- an increase in cost by < 30%
- an increase in cost by >30% <50%
- an increase in cost by >50%
- No impact
- Not applicable/no relevant experience or knowledge.

17. **Cost of applying the rules** – do you think that, compared to 2009-13 (when the sector was regulated only by the 2009 Broadband Guidelines) the **General Block Exemption Regulation** has led to

- a reduction of the cost by < 30%
- a reduction in cost by >30% <50%
- a reduction in cost by >50%
- an increase in cost by < 30%
- an increase in cost by >30% <50%
- an increase in cost by >50%
- No impact
- Not applicable/no relevant experience or knowledge.

18. Are the parts of the General Block Exemption Regulation related to **notification and evaluation amounts ('thresholds')** adequate for efficient State aid expenditure?

- Yes
- No
- Not applicable/no relevant experience or knowledge

Please explain and give examples

3000 character(s) maximum

Section 3 – Relevance

Is EU action still necessary? Are the policy objectives still the right ones?

Are the current EU state aid rules still relevant, given the changes in EU priorities and/or new market and technological developments?

19. How well do the objectives of the state aid rules for the deployment of broadband infrastructure meet the following needs:

| | Totally | Partially | Not at all | Not applicable /no relevant experience or knowledge |
|---|-----------------------|----------------------------------|----------------------------------|---|
| Current EU priorities | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Equipping EU society with better internet connections (as laid down in the Gigabit communication): all households should have access to internet connectivity of at least 100 Mbps download , upgradable to 1 Gbps | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Equipping EU society with better internet connections (as laid down in the Gigabit communication): key socio-economic drivers such as schools, transport hubs and main providers of public services, as well as digitally-intensive companies, should have access to internet connectivity with download and upload speeds of 1 Gbps | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Equipping EU society with better internet connections (as laid down in the Gigabit communication): uninterrupted 5G coverage for all urban areas and major terrestrial transport paths should be ensured | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| EU society's connectivity needs revealed by the COVID-19 crisis | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Responding to ongoing technological developments in the telecoms sector since 2013 | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Responding to ongoing market developments in the telecoms sector since 2013 | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

Die NGA-Definition hat sich als zu statisch erwiesen

20. Overall, are there aspects that the state aid rules for the deployment of broadband infrastructure **do not currently cover**, for which extra objectives could be added? (several answers possible)

- Yes, environmental aspects
- Yes, education
-

- Yes, public health
- Yes, security
- Yes, others
- No Not applicable/no relevant experience or knowledge.

Please explain and give examples

3000 character(s) maximum

Section 4 - Coherence

21. To what extent are the state aid rules for the deployment of broadband infrastructure consistent with EU policy on electronic communications, in particular the following acts:

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|--|-----------------------|-----------------------|-----------------------|-----------------------|---|
| Gigabit Communication (COM(2016) 587 final) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Broadband Cost reduction directive (Directive 2014/61/EU) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| European Electronic Communications Code (Directive 2018/1972/EU) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

22. Are the state aid rules for the deployment of broadband infrastructure consistent in the following senses?

| | Totally | Partially | Neutral | Not at all | Not applicable /no relevant experience or knowledge |
|---|-----------------------|-----------------------|-----------------------|-----------------------|---|
| Consistent with other EU state aid rules? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| | | | | | |

| | | | | | |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Are the Broadband Guidelines internally consistent (i.e. are there any internal contradictions, etc.?) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Is the General Block Exemption Regulation consistent with the Broadband Guidelines? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

23. To what extent are the rules in the General Block Exemption Regulation consistent with the following acts:

| | Totally | Partially | Neutral | Not at all | Not applicable/no relevant experience or knowledge |
|---|-----------------------|-----------------------|-----------------------|-----------------------|--|
| Gigabit Communication (COM (2016) 587 final). | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Broadband Guidelines (2013/C 25/01) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please explain and give examples

3000 character(s) maximum

Section 5 - EU added value

Did EU action – in this case, the EU state aid rules – provide clear added value? How useful were they?

24. Have the state aid rules subject to the current evaluation provided an added value in comparison to a situation without Guidelines and General Block Exemption Regulation, in which case each individual state aid measure would have to be dealt with separately, directly applying the [TFEU](#))?

- Totally
- Partially
- Neutral
- Not at all
- Not applicable/no relevant experience or knowledge

Please explain especially where you answered no or partially

3000 character(s) maximum

Final comments and document upload

25. Is there anything else you would like to add?

5000 character(s) maximum

You may attach relevant supporting documents to this questionnaire.

The maximum file size is 10 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

* Can the Commission contact you for further details on the information you have submitted, if required?

Yes

No

THANK YOU FOR RESPONDING TO THIS QUESTIONNAIRE

Contact

COMP-BBGL@ec.europa.eu