

To European Commission concerning the proposal on the Commission's Broadband Guidelines

I would like to have the following comments on the broadband guidelines:

1) Public support for the last mile connections / NGA's; private homes', farms' and small companies share of costs

The proposal has no exact statements concerning the public support for the last mile connections.

Only on chapter 3.1. (46) is said, that many member states are planning to support NGA's, and on chapter 3.4.5 is said, that in black areas no support should be paid for last mile connections.

As a person who has in the EU program period 2000-2006 been managing the construction of broadband connections in wide (100 000 km<sup>2</sup>) non-profit areas in Finland, I would recommend that the Commission would have a more active role in assuring that the efficient broadband connections will be implemented fully, including the last mile connections in non-profit areas, and that public support will be directed to last mile connections.

For example, the current national broadband policy of Finland says, that the new optic fiber network will be built with public support upto 2 kilometers from the users, and that the users themselves should pay the implementation of the last 2 kilometers. As the implementation cost of optic fiber is approximately 6 euros per meter in Finland, the implementation cost for private homes may be upto 12 000 euros for the last 2 kilometers, plus the usage and all the other costs of having the access to the network. This is not a reasonable cost for private homes, farms and small firms, and, if no public support will be paid for the last mile, in these areas there will be no real broadband in the future. That will also mean, that the principal ideas and the objectives of the Commission's broadband policy will not come true in non-profit areas.

2) Municipalities' share of costs

In Finland, municipalities in the non-profit areas are in huge economic crisis. Despite of that, they are expected to pay upto 1/3 of the construction costs of new optic fiber networks. They truly can not afford that, so I would recommend that the Commission would give direct orders of how direct EU support could be used for helping the municipalities to have these networks being built. - If no fast help will be received, practically all educated people will move out from these areas, and farms and small companies will lose their ability to work. Also digital public services may not be taken in use in these areas, because of the lack of proper infrastructures, and this will lead into more growing difficulties in the whole society.

Hoping good results with the broadband guidelines,

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