



24 June 2009

**Ministry of Enterprise, Energy and  
Communications Sweden**

*Department for Market and Competition*

**Comments from the Swedish Government on the Community Guidelines for  
the application of State aid rules in relation to rapid deployment of  
broadband networks**

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Sweden welcomes the European Commission initiative and by large supports the proposed guidelines.

We also support the Commissions' view that the duty to provide open access is of vital importance to ensure that existing incumbents are not unduly favoured and to ensure efficient competition.

We share the view expressed by the UK at the multilateral meeting that the phrase "best economic offer" in p. 45 a) should be rephrased into "most economic advantageous tender" or similar, since the existing wording is too much focused on price.

Finally, while we agree with the Commission on the importance of the benchmarking price exercise and the claw-back mechanism as such, we share the views expressed by several member states that in the current wording they lead to an unnecessary increase in the administrative burden of the member states and rather should be decided on a case-by-case basis.

