

## **Network Automation AB**

### **Response to EU Commission Public Consultation on Next Generation Access Networks (NGA)**

#### **Executive Summary:**

This is Network Automations response to EU commission public consultation regarding new recommendation on regulated access to Next Generation Access.

It is our opinion that regulation must continue to place emphasis on network infrastructure competition. The regulation should avoid relaxing the infrastructure competition requirements based on perceived limited technology or economic viability. The industry and business will adopt and provide solutions as long as the regulation is clear.

Efficient copper access network management should not be forgotten as underlying facilitator for NGA deployment. Regulation should continue to put focus on improved efficiency in operations of the copper network as a key component for NGA development.

In general we agree with the proposed recommendation in so that it put emphasis on network infrastructure competition as the key mechanism to be applied.

Simplified access to connectivity is a key component stimulating competition and must be consistent across the regulation area.

We like to add that there are already today automated solutions that do support much simpler and cost efficient connectivity for operators in the access network, thus facilitating more efficient infrastructure competition.

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## 1 INTRODUCTION

This report is the response from Network Automation AB, on the open consultation from EU, regarding regulation for next generation networks.

### 1.1 Record of changes

Rev.	Date	Prepared	Changes made
A.00	2008-10-29	LEH	Draft Version
A	2008-11-13	LEH	Release revision A

## 2 Background

The EU Commission is currently preparing a Recommendation on regulated access to Next Generation Access Networks (NGA), and seeks the views and contributions of all interested parties on all aspects of the draft documents.

Objective of the new recommendations as stated in the request for consultation:

- Give guidance to NRAs on the treatment of regulated access to NGAs
- Prevent fragmentation of the internal market
- Incentivise investments in NGAs
- Forster competition in the new environment

### 3 Response

It is our opinion that regulation must continue to place emphasis on network infrastructure competition. The regulation should avoid relaxing the infrastructure competition requirements based on perceived limited technology or economic viability. The industry and business will adopt and provide solutions as long as the regulation is clear.

We also believe that access to connection and concentration points for effective competition must be mandated in any network development. Such access should not be allowed to be made more complex or inaccessible by any solution deployed. On the contrary any development should be encouraged to simplify and to improve management of the copper network as well.

It is our understanding that although closely associated with fibre networks the NGA encompass all and any media and specifically also copper. As described in the recommendation introduction of NGA will be in parallel to legacy copper networks. As a consequence improvements to copper networks and specifically management and operation and maintenance cost should not be underestimated as a driver for NGA implementation.

Furthermore we like to point out that our company has been providing products that facilitate connectivity for some time now. Our Automatic Distribution Frames (ADF), commercially available and deployed today, simplifies management of connectivity between services and operators in the copper access network.

The result of managing copper connectivity manually, as today all operators do, is a very costly operation, with high degree of faults providing inefficient mobility between services and operators. The real competition is seriously hampered by these manual, both historic and current, procedures.

As the consultation also points out, studies indicate that NGA networks are less costly to maintain. With ADF solutions, the cost for managing the copper network is reduced. This will facilitate the implementation of NGA.

We would also like to point out that price control referencing "operating cost of an efficient operator" not necessarily facilitate introduction of new solutions aimed at improving operational efficiency. In this area we feel that NRAs must be able to more actively both require and inspire continuous improvements to reduce cost.

We believe that although development is predicted based on technological feasibility, regulation must be technology neutral and focus on the key objective to facilitate cost efficient solutions for the end customer.

It is also important that the regulation is consistent across the member states and that local requirements are avoided. We believe that facilitating competition at the highest level is the most efficient way to drive the NGA development.

## 4 Conclusion

In general we agree with the proposed recommendation in so that it put emphasis on network infrastructure competition as the key mechanism to be applied.

Simplified access to connectivity is a key component facilitating competition and must be consistent across the regulation area.

We like to add that there are already today products that do support much simpler and cost efficient connectivity for operators in the access network, thus facilitating more efficient infrastructure competition.

## 5 References

White Paper: Automated MDF, Automating the last mile

White Paper: ADF in Next Generation Access solutions

NeXa reference list