

Commission of the European Communities

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Submission on public consultation on NGA

The Danish Energy Association complements the Commission on initiating a public consultation thereby giving the relevant stakeholders an opportunity to state their views on the matter of Next Generation Access Networks.

The Danish Energy Association urges the Commission to draw up objectives for the member states and promote as well as facilitate the creation of long term national broadband plans concerning Next Generation Networks (NGN). This could be done by a Commission recommendation which state that by 2010 all member states should have and submit to the Commission their national plans for NGN.

The Danish Energy Association welcomes the Commissions initiative to further promote and support the transition to Next Generation Networks in the EU in order to foster investment and innovation.

In this context the Danish Energy Association suggest that the NRAs are giving the proper tools to make sure that fiber and not copper is deployed wherever new electronic communications networks are set to be built. It is not seen as ambitiously enough that the NRAs only "should promote" this principle, as suggested by the Commission.

The Danish Energy Association support the Commission in the effort that the NRAs should provide access to the networks owned by operators with significant market power (SMP).

The Danish Energy Association also support that the Commissions aim is directed towards the dominant operators. In relation to alternative markets players the Danish Energy Association urges the Commission to show timely restraint and not intervene with prematurely regulation, since this could have the advert effect and unnecessarily slow down the deployment of fiber. The alternative market players who compete with the SMPs are also in need of regulatory certainty and need to be able to recuperate the investment made in deploying fiber optics to the end-users.

Besides the need for regulatory certainty there is a need for information about the SMPs future network modification plans in order for long term planning by alternative providers who uses or intends to use the SMPs infrastructure. The Danish Energy Association supports this initiative set forth by the Commission.

The Danish Energy Association also strongly supports the Commission proposal that the SMP operators are obliged to make sufficient space for other operators when rolling out new ducts, other civil engineering works and other elements which are not active. The Danish Energy Association suggest that this should also include an obligation on the SMP operators to invite alternative providers to participate in all local digging projects when SMP operators upgrade existing networks from copper to fibre infrastructure. Seen from an economic and social perspective this would in the end be to the benefit of the consumers in terms of increased infrastructural competition and lower prices on high-speed broadband.

About the Danish Energy Association

The Danish Energy Association is a commercial organization for Danish energy companies. It is managed and financed by its member companies, mainly the electricity companies, and works to secure them the freest and most favorable conditions for competition and development in order to ensure development, growth and well-being in Denmark.

The Danish Energy Association also covers the interests of the energy companies' commercial roll-out of optical fibres to consumers and business customers. This activity includes 14 companies covering most part of Denmark. A presentation of the activity is attached.

Please do not hesitate to contact us if you have any questions to our submission on the NGA hearing or other aspects in the broadband field. Contacts are: Christian Berg, +45 22 750 411 / chb@danskenergi.dk and Morten Baadsgaard Trolle, +45 22 750 418 / mob@danskenergi.dk.

Best regards
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