

20.11.2008

Ref Commission's public consultation on Next Generation Access Networks (NGA)

Title Comment on Commission's draft recommendation on regulated access to Next Generation Access Networks (NGA)

Rapid construction of Next Generation Access Networks and adoption of new broadband services are crucial to the favourable development of European economy in a globally competitive environment. The Commission has done good work preparing its draft recommendation on regulated access to Next Generation Access Networks.

Bringing the construction of optical fibres closer to the end-users can be seen as an integral part of development of NGAs. The majority of costs related to construction of fibre optics consists of digging the cable to the ground. The draft recommendation speaks out for imposing duct access obligations on the Significant Market Power (SMP) operators. However the legislation related to building communications networks doesn't authorise obligating other civil engineering actors to share their infrastructure with communications networks. Ministry of Transports and Communications seeks actively to contribute to all legislation related to civil engineering construction so that the building of communications networks infrastructure could be taken into account in cooperation with other infrastructure construction actions.

In addition to imposing duct access obligations on the Significant Market Power (SMP) operators The commissions proposal should also take into account and emphasize the importance of cooperation with other civil engineering infrastructure construction.

In a sparsely inhabited country, such as Finland, competing fibre optics based infrastructure develops only into the largest cities while the majority of the country attracts only one actor to build commercial based fibre optics. In Finland it has been estimated that approximately 5 per cent of households would be left fully outside the supply of optical fibre if no public funding would be granted to the construction of networks. The demands of open access to networks should be taken into considerations, especially in the regions where there is no competitive supply of optical fibres.

Commissions recommendation should also address the impact of regulation on open access to NGAs.

Yours sincerely,

Timo Kievari
Senior Officer
Unit for Communications Networks

Postal address	Visiting address	Telephone	Telefax
PO Box 31 FIN-00023 Government FINLAND	Eteläesplanadi 16-18 Helsinki	+358 9 160 02	+358 9 160 28596 +358 9 160 28590 (Information)