



STATEMENT ON THE GUIDELINES FOR TRANS EUROPEAN TELECOMMUNICATIONS NETWORKS

City governments play a key role in the realisation and maintenance of infrastructure (transport, energy, ICT), especially with regard to 'the last mile'. Currently investments from the market in cities are not always ambitious enough to ensure future-proof and capable high-speed broadband for every individual and business. In many urban neighbourhoods there are still severe problems of ineffective demand and digital exclusion. Similarly, the political priority at EU to support the start-up and development of Small and Medium Enterprises (SMEs) must also be accompanied by investment in the infrastructure that they need to ensure they can be competitive nationally and internationally.

As EUROCITIES, Europe's network of major European cities, we believe that empowering cities to address missing links in our digital networks is crucial to Europe's ability to achieve economic recovery and the Europe 2020 goals.

The instruments proposed under the Connecting Europe Facility are key to Europe's future, and maintaining a clear focus on broadband infrastructure in urban areas must remain a strong component in the guidelines for trans-European telecommunications networks.

SPECIFIC COMMENTS ON THE DRAFT REGULATION

- Add a clear reference to cities in article 5

Cities eligible for funding under the Connecting Europe Facility should be consulted on any delegated acts altering the criteria or areas of intervention for projects of common interest, as laid out in Article 5.

- Add a clear reference to city and regional authorities, private operators, utilities and equipment manufacturers in article 7

Within the Connecting Europe Facility the coordination of activities with national and regional broadband plans will be essential. We therefore recommend amending article 7 of the draft regulation to include the involvement of actors besides member states (namely, city and regional authorities, private operators, utilities, equipment manufacturers) in the planning, development and operation of digital telecommunications networks.

The regulation should also be amended to enable forms of structured cooperation with city and regional authorities, and to ensure the involvement of their experts

in thematic expert/advisory groups set up within the framework of the Connecting Europe Facility.

- **Maintain options for very high-speed broadband in urban and suburban areas in annex**

We welcome the specific sectoral objectives on the deployment of broadband networks and digital service infrastructure, as laid out in article 4 of the draft Regulation on the Connecting Europe Facility.

Market incentives to invest in Fibre to the Premises (FttP) are very limited in many urban areas, for example in socially deprived neighbourhoods and areas which are home to micro businesses and SMEs.

It is therefore imperative that funding for urban and suburban areas in which the business case for advanced technologies and very high speed networks (FttP) is insufficient, as outlined in the draft regulation, remains a strong focus of the final guidelines and the Connecting Europe Facility spending on Broadband.

- **Add guiding principles for the selection of very high speed broadband projects**

At the moment, the regulation lacks clear technical criteria to guide the selection of projects of common interest in the area of very high speed broadband. We recommend that the regulation include four key principles:

- **Open access:** networks should provide equal opportunities for service providers, free choice for users, and room for innovation.
- **Scalable:** networks should use point-to-point (PTP) fibre infrastructure and not point-to-network (PON). This means that each user/location can be linked to another with a physical fibre connection. PTP architecture is the most secure set-up to meet future needs of traffic volume and speed.
- **Symmetric:** networks must have symmetric up- and downstream speed.
- **Affordable:** access to networks must be affordable for every citizen and business.