

Input to BEREC Stockholm 2019-09-02

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## The Swedish Local Fibre Association input to BEREC Working Group's call for input on potential regulatory aspects of 5G.

## Introduction

The Swedish Local Fibre Alliance (Swedish; Svenska Stadsnätsföreningen) is a trade association which organizes some 155 local fibre networks as members. The Swedish Local Fibre Alliance represents thereby an absolute majority of those players which actively invest in new modern fibre infrastructure for high capacity broadband in Sweden.

The primary objective for the Swedish Local Fibre Alliance and its members is to provide open competition-neutral high capacity fibre networks in an atmosphere of free choice, transparency and non-discrimination. Open networks allow both existing and new players the opportunity to establish their business and to supply services by leasing dark fibre or wholesale capacity services without having to invest in their own infrastructure. These open networks thereby create a level playfield for retail competition to the ultimate benefit of residential inhabitants, business enterprises and municipal activities in each respective community and region, in both rural and urban districts.

The members of the Swedish Local Fibre Alliance are local fibre networks that are municipally operated and locally established, usually within a municipality. Representative of the members is that they are not vertically integrated, i.e. they do not offer retail services in competition with other service providers.

Over the last 20 years, these local fibre networks have played a major role in helping to deploy fibre optic networks in Sweden, thereby contributing to the development of Sweden's successful information society. The Swedish Local Fibre Alliance estimates that local fibre networks currently own approximately 50 per cent of the fibre access networks in Sweden. It is also the investments by local fibre networks that have laid the foundation for the well-functioning competition at the infrastructure and retail level in Sweden.

## Input on potential regulatory aspects of 5G

The Swedish Local Fibre Alliance (Svenska Stadsnätsföreningen) would like to give the following input to BEREC Working Group's call for input on potential regulatory aspects of 5G.

The Swedish Local Fibre Alliance makes the clear assessment that the MNOs that acquire national 5G radio spectrum in the 3,5GHz band or higher bands, will not find commercial reasons to build their 5G network according to all coverage requirements that need to be met to enable future digitization of the local and regional society or the industry.

The ambition from these verticals to create enhanced coverage, capacity or functionality for their critical applications, both indoors and outdoors, calls for local initiatives to establish neutral wholesale networks. Neutral host networks can assemble different verticals in a robust and cost-effective infrastructure representing a sufficiently large unit to be commercially attractive to operators. It is also necessary that the verticals can invest in local 5G infrastructure and obtain interoperability with national 5G networks without having to compromise their ability to switch suppliers.

The standardization, technical development and business models of 5G must be coordinated to support infrastructure sharing and a neutral wholesale operator structure that can be an enabler or motivator for the different verticals to invest in complementary 5G infrastructure where needed. The Swedish Local Fibre Alliance would like to encourage BEREC working group to study all regulatory, technical and business model aspects that can enable the establishment of neutral operators and their interoperability with national MNOs.

The expansion of 5G both indoors and outdoors will create enormous challenges especially concerning the coordination and cost-effective deployment of antenna placement, electricity and transmission back haul for small cells. The Swedish Local Fibre Alliance encourage and support its members to develop coordinated, future proof, secure and cost-effective wholesale products as well as to commit trials with the industry for all those aspects of the infrastructure planning. The Swedish Local Fibre Alliance therefore welcomes BEREC working group's suggestion to study the importance of the roll out dimension and its impact on the success of the development of 5G.