

To: the European Commission

Brussels, 2 December 2022

With regard to the vision and avenues for Europe's digital transformation by 2030, Member States consider it crucial to develop a structured and well-designed framework to achieve the 2030 connectivity targets. Part of this legal framework is the Broadband Cost Reduction Directive (BCRD). A revision of this directive has the potential to make important strides towards improving digitalisation. We urge the Commission to quickly publish the long-expected BCRD review, aiming at accelerating the deployment of very high capacity and future networks.

At the same time, we do not consider it appropriate to combine or merge the BCRD review with the current discussion concerning the claims by network operators to make certain OTT players pay a share in the network operators' network deployment costs (also known as "fair share" or "network fees" debate). These are distinct topics which merit proper assessment on their own merits.

We call to refrain from any plans of integrating ideas or proposals on the "fair share" debate into the proposal of the BCRD.

Both topics should be treated separately.

We as Member States have always considered an open and transparent debate on substance on the "fair share" topic as of great importance. This continues to be the case. We therefore welcome the Commission's announcement of a public consultation. However, we urge the Commission to further create transparency on its intended timeline, analyses and steps on this topic.

Austria
Estonia
Finland
Germany
Ireland
The Netherlands