

## NOTE

21 June 2012

### **Response from the Danish Government to the public consultation on an EU Initiative to Reduce the Cost of Rolling out High Speed Communication Infrastructure in Europe**

The Danish Government generally supports all initiatives and efforts where the aim is to advance the rollout of high-speed broadband infrastructure. The Danish Government acknowledges that high-speed broadband is a key element to stimulate growth and create further job opportunities.

It is the Danish view that sharing of infrastructure should be encouraged as it can give several advantages such as direct savings and those savings could lead to a further rollout.

Enhanced transparency and coordination of civil engineering works is already used in the Danish telecommunication industry. This seems to add to additional rollout and lower costs.

The members of the Telecommunications Industry Association in Denmark cooperate with a joint cable laying database in regard to underground cables. The database is made up of the email addresses of the different parties. When a member wishes to lay cables at a specific range and wishes to invite other parties to participate, this member uploads a map showing the details on the database, so all the members receive it by email. Those who wish to join the cable laying simply reply to the mail and then enter into negotiations on the details in the joint cable laying.

The issue of handling requests to roll-out networks is in Denmark handled by local authorities. These may use coordination meetings and contact lists to coordinate in a transparent way and on equal terms. The interest of implementing more efficient and in transparent ways is in cooperation between the local municipalities who wishes to relieve their citizens from too much civil engineering together with the relevant infrastructure providers. As each Member State may have different levels of authority for granting access to shared infrastructure future legislation should reflect these differences. This is also true regarding the availability of passive infrastructure in the Member States.

Denmark notes that not all existing infrastructure is easy to share, e.g. there is a safety issue regarding railway infrastructure, HVDC (high voltage power supply) and gas supply lines may restrict the access to infrastructure sharing.

The Danish broadband strategy is market based and imposing obligations to ensure "Ready for NGA access" buildings could lead to inefficient

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rollout and supply in buildings where there is no real demand. Also, some buildings may be very expensive to equip with NGA due to cultural heritage management, pollution (e.g. asbestos) or other reasons. This should also be taken in to consideration.

Any obligation imposed should in all cases be phrased in a technology neutral language so no specific technology is required where a different technology may be more suitable.