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European Commission
Commissioner Günther Oettinger
Digital Economy and Society
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

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**Germany needs investment incentives in order to move towards a gigabit society;
A vectoring monopoly delays future fiber deployment and increases its costs**

Dear Commissioner Oettinger,

The promotion of fiber investments is one of the biggest challenges to be faced by Germany and Europe for the successful transition to a gigabit society through gigabit networks. Deploying vectoring technology might be a necessary intermediate step in order to ensure a fast and full coverage.

However, the associations signing this letter have major concerns regarding the ongoing discussion on the monopolistic upgrading of the network using vectoring technology. After almost 20 years of successful competition in the telecoms areas, there is now the risk of granting one company an exclusive right to deploy this technology. The decision proposed by the German National Regulator Bundesnetzagentur (BNetzA) has now been published and notified to the Commission. According to this proposed decision, Deutsche Telekom will be granted the right to exclusively install vectoring equipment at street cabinets in the nearshore area around the 8.000 German main distribution frames (MDFs), with wires of maximum 550 m defining this nearshore area. It is commonly known that exactly those areas are the most profitable ones when it comes to the roll-out of broadband in Germany. The resulting obligation to overbuild already existing Next Generation Access infrastructures, including Fiber-to-the-Building or Home (FTTB/H) and TV broadband cable, would not only be unique itself, but would also intensively harm infrastructure-based competition in Germany and Europe.

We need strong signals for international investors in order to win their support for investing in fiber projects in Europe. Investors, which play a key role for our gigabit society, deserve certainty and equal treatment. The European as well as the German economy are based on high-quality competition rather than re-monopolization. Only in that way, we can strengthen and secure our successful business location. The German economy relies on a viable competition for investment that allows for a fast migration to future-proof gigabit networks.

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Granting the right of an extensive technological monopoly for the very first time will hinder billions of investments to flow to Germany due to a lack of competition for investments. Consequently, this will influence the development of our businesses in the next decade – especially in rural areas, where a significant part of our German economy is located. Instead of catching up with fiber to the home and business compared to our international neighbors, Germany risks to further fall behind compared to economically vibrating regions in Asia and US. Well-known researchers agree on that. Facing the ever increasing challenges of digitalization, German companies from sectors like industry, SME, trade, service and agriculture need a full-coverage broadband network that allows for speeds beyond 50 Mbit/s. On a long-term and sustainable basis, this is only possible through an immediate, massive and continued roll-out of a fiber network.

Consequently, this case is not only about a decision of a pure regulatory request made by Deutsche Telekom. It is not about the question of how to regulate access to 8,000 MDFs. This case is a political landmark decision which will have such a far-reaching impact on Germany so that politics has to meet its regulatory and infrastructural responsibility.

Investments in the roll-out of fiber networks, which are realized up to 80 % by competitors when it comes to fiber to the home networks, need as much regulatory certainty as companies and municipalities planning to increase the roll-out – also with vectoring. For the immediate roll-out of fiber and the eligibility of vectoring, businesses and municipalities clearly need a political decision against a vectoring-monopoly. We need this decision now.

You might be aware that Deutsche Telekom underestimates the broadband demand for 2026 with only 200 Mbit/s for private and business consumers as well as the upload that is getting increasingly important for business customers. Businesses and signatories are convinced that it is the actual future supply offered to companies and consumers which will define international competitiveness. As a monopolistic vectoring roll-out will hinder and delay the expansion of FTTB/H, choices for consumers will suffer and the chance of actual digital participation will decrease. Consequently, our goal has to be a gigabit society. Only competition for infrastructure deployment and investment will lead to a fast roll-out of the required gigabit networks. As a result, our investors and businesses cannot accept a far reaching technological monopoly that would benefit individual players.

Therefore, we are asking for your concrete support in the ongoing notification process.

Yours sincerely

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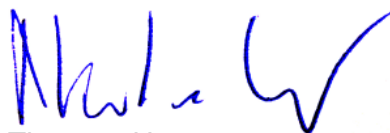
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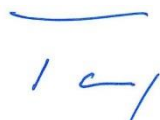
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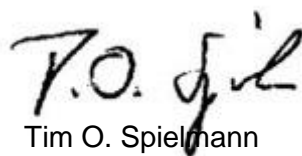
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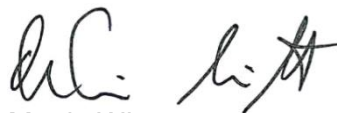
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