

March 13, 2023

Dynamic Spectrum Alliance (“DSA”) response to the consultation on the 2030 Digital Decade Policy Programme – key performance indicators.

Ref. Draft implementing decision – Ares(2023)1032143 - 13/02/2023

The Dynamic Spectrum Alliance (DSA) appreciates the opportunity to provide comments to the European Commission’s draft implementing Decision on the Key Performance Indicators (KPIs) for the Digital Decade Policy Programme (DDPP), in order to monitor progress against the targets outlined in the DDPP and showcase trends at a national level. We also welcome the European Commission’s mention of KPI-modification, with the view of better reflecting these targets in a comprehensive manner in the future and taking into account new technological developments and socio-economic changes.

In support of Europe’s vision, DDPP targets, and avenues for Europe’s Digital transformation, we would like to highlight two areas for further work and elements to take into consideration.

- Gigabit connectivity:

In our view, the best and most efficient way to achieve the gigabit connectivity targets for citizens and businesses in Europe is through an approach that recognizes and encourages all technologies with equivalent gigabit performance, such as fibre, cable, satellite, fixed wireless access, and the latest generations of license-exempt technologies such as Wi-Fi, as recognized in Recital 14 of the DDPP. Particularly, next-generation Wi-Fi will be essential for providing in-building gigabit connectivity and thereby an essential complement to the roll-out of fixed gigabit networks to the premises.

Adequate in-building connectivity is critical for the end-user experience and hence for the attractiveness and eventually the take-up of gigabit services. It is necessary for users to be able to “use” the gigabit services provided by fixed networks up to the network termination point, as provided by Recital (13) of the DDPP. In order to reflect this DDPP ambition, the Commission should ensure that the consultant study that KPIs also assess whether and how adequate connectivity is ensured within the premises (i.e., homes, offices, business premises), i.e., from the termination point up to the end-user device.

Possible KPIs would include percentage of households equipped with Wi-Fi 6/6E/7 access points, percentage of households with actual average Wi-Fi speed of at least 1 Gbps or percentage of households with a Wi-Fi connection slower than the fixed connection. Any other approach would not constitute a sufficient measurement of the gigabit connectivity enjoyed by European users.

Thus, the DSA proposes that the third KPI under Article 2 is modified as follows:

“(3) Gigabit connectivity, measured as the percentage of households covered by fixed Very High Capacity Networks (VHCN). The technologies considered are Fibre to the Premises and Cable DOCSIS 3.1. The evolution of the Fibre to the Premises coverage will also be monitored separately, and taken into consideration when interpreting VHCN coverage data. **The availability of gigabit connectivity within the premises from the network termination point up the end-user device will also be monitored separately. This will include measuring the percentage of households with actual average Wi-Fi speeds of at least 1Gbps.**

- 5G coverage:

5G services are critical to Europe’s digital transformation. While measuring 5G coverage is welcome, the DSA would like to note that a KPI only focusing on 5G coverage would not reflect the DDPP target which refers to “next-generation wireless high-speed networks with performance at least equivalent to that of 5G”. In this sense, we welcome the European Commission proposal allowing for a modification of these KPIs to better identify these other networks, but urge the Commission to include in the implementing Decision the commissioning of a study on this issue with a view of including new KPIs by the end of 2023. Next generation Wi-Fi or satellite technologies should be included in the study.

It is also important to note that the 5G landscape is becoming increasingly diverse with tower companies, private 5G networks, and complementary technologies all playing important roles. We encourage the Commission to ensure that the consultant study measuring implementation of 5G coverage duly considers all aspects of this complex landscape, as well as the importance of flexible spectrum management frameworks that offer new spectrum access options, such as shared or local licenses, in addition to traditional, nationwide exclusive licenses.

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Respectfully submitted,

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Martha SUAREZ
President
Dynamic Spectrum Alliance