



ELFA European Election Paper 2024

- moving towards fibre connectivity to all European citizens and businesses

The European Local Fibre Alliance (ELFA) shares the European Union’s ambition to bring all-fibre networks (FTTH/B) to all European households and businesses ensuring that all parts of Europe have access to the most advanced communications and computing infrastructure. This will enable the EU to stay innovative and competitive with other leading global regions. Only fibre connectivity provides true gigabit speeds with the lowest possible latency and energy consumption, laying the foundation for a digital and sustainable Europe.

Brussels, 23 May 2024

Ahead of the upcoming European elections in June 2024, we would like to address some important measures that we believe are necessary to realise the European Union’s ambition to bring fibre connectivity to all European citizens and businesses by 2030.

Safeguarding competition and investments in all-fibre networks

Over the past 10-15 years, local and regional fibre operators throughout Europe have made significant investments in deploying all-fibre and future-proof networks (FTTH/B) to citizens and businesses in both urban and rural areas – removing the digital divide once and for all. Today, ELFA's members represent more than 800 operators which provide more than 50% of the FTTH/B availability across Europe. This contribution massively supports the European Union's ambition of providing fibre connectivity to all European citizens and businesses by 2030.

The extensive deployment of fibre networks has put high pressure on the former state enterprises as well as cable operators to upgrade their networks to meet the competition from the fibre entrants. From the point of view of consumers, this increased competition has led to a higher freedom of choice, access to higher broadband speeds, and affordable retail prices on fixed broadband connectivity for Europe’s citizens and businesses.

ELFA supports the EU’s recent policy initiatives as they provide better incentives for faster roll-out of fibre, including a safeguard against anti-competitive overbuild by the former state enterprises and other operators with dominant market power.

ELFA welcomes the Commission's White Paper “Building Europe’s digital infrastructure of tomorrow” as a basis for an open discussion on the scope and content of a potential future Digital Networks Act. Like the Commission, ELFA believes that setting a policy goal for the ubiquitous availability of fibre by 2030 will further encourage the network operators represented by our members in their significant efforts to ensure that all



parts of Europe have access to the most advanced communications and computing infrastructure. This will enable the EU to stay innovative and competitive with other leading global regions.

However, ELFA clearly rejects the assumption of too much fragmentation within the telecommunications market and the necessity for a few 'European champions', due to the fact, that the local and regional fibre operators today represent a significant part of the European fibre footprint and are committed to continue their significant investments in the coming years. Maintaining a diverse and competitive telecommunications market enables the European Union to develop further and to move towards gigabit society.

Greening of digital networks – replacing copper with fibre

ELFA welcomes a policy goal for the completion of copper switch off since we see it as a decisive lever in order to achieve comprehensive fibre-connectivity throughout the EU and stimulate take-up of FTTH/B services. We believe that the maintenance of copper networks strongly contributes to delaying the roll-out and take-up of fibre networks in Europe. However, it is crucial that European Regulators first set a clear framework which ensures that copper networks are phased out specifically on terms which are fair and reasonable to avoid distortions of competition by the former state enterprises.

ELFA supports the proposed initiative by the Commission to facilitate the greening of digital networks through promoting a timely switch-off of copper networks and the move to full-fibre networks. Fibre networks (FTTH) consume considerably less power than copper or cable-based networks, making them more energy efficient and environmentally friendly.

ELFA welcomes the Commission's plan to develop, by 2025, an EU Code of Conduct for the sustainability of electronic communications networks to help steer investments towards sustainable infrastructures. Moreover, ELFA highly welcomes the Commission intention to work together with industry to further develop the scope of the EU taxonomy. The EU taxonomy should definitely be further developed so that the expansion of fibre optic networks is acknowledged as a sustainable investment. It is undisputed that fibre optic networks are more energy-efficient than conventional copper networks and can thus contribute to the sector's sustainability. A clear classification as a green investment within the framework of the EU taxonomy would send a clear signal to investors and would help to accelerate the expansion of fibre optic networks.

Secure and resilient fibre networks

In a geopolitical environment, increasingly defined by tension and conflict, ELFA strongly believes that there is a need for improving security in the supply and in the operations of fibre networks across Europe. The necessary measures include the NIS2 Directive – boosting the overall level of cybersecurity in Europe – and the newly agreed Cyber Resilience Act, contributing significantly to securing EU's digital infrastructure, including the use of quantum-resistant cryptography.

ELFA believes that Europe must strengthen its digital sovereignty and set standards, rather than following those of others with the risk of digital dependencies and cyber vulnerabilities. We support the transition from centralised Cloud computing facilities (including hyperscalers) to decentralized Edge computing facilities –



including the EU's ambition on the deployment of 10,000 climate-neutral and highly secure edge nodes in Europe by 2030 – which must include a feature allowing further control of the location of data relevant to privacy or regulatory compliance.

Next generation gigabit Wi-Fi

Today, most internet traffic generated by Europeans goes through indoor Wi-Fi. The majority of traffic is generated indoors where people tend to spend most of their time; we spend 90 percent of our time indoors, and up to 80 percent of our data is consumed there¹. It is estimated that 70-80% of the mobile data is offloaded to Wi-Fi networks². Despite these compelling facts, indoor connectivity has been disregarded in the EU and national government's connectivity plans. Failing to address the importance of indoor wireless connectivity as part of infrastructure is a risk to EU's digital targets. As the EU progresses towards being gigabit (many operators are already offering gigabit fibre connections in most Member States) and the number of connected devices continues to increase, a connectivity bottleneck is emerging inside the home and the office.

This is especially important as the EU is already missing out on the next wave of the Wi-Fi revolution powering new applications. Licence-exempt spectrum plays an important role in the 5G networks through network offloading. 5G country leaders like the US and South Korea have recognised this fact and confirmed the benefits of the next generation of Wi-Fi technologies to their societies by opening the upper 6 GHz band to licence-exempt access. By contrast, the EU is still deciding on the future of this band. The US and South Korea cases illustrates that 5G success and sufficient Wi-Fi spectrum go hand-in-hand.

ELFA therefore call on the EU to ensure that the spectrum strategy for the next decade properly addresses this shortcoming around Wi-Fi. This would require including indoor wireless connectivity in policy considerations and securing the 6 GHz spectrum band that gigabit Wi-Fi use cases are currently waiting to be unlocked. Firm and swift action in this regard is essential for the EU's digital and global leadership.

Improving consumer and business awareness about the benefits of fibre connectivity

European consumers are confused about the terms used to market broadband and find it difficult to identify which services provide the best performance. Consumers' focus continues to rest with download speeds and quality of service in many cases and speeds are typically referenced as "expected" or "average" on legacy networks. The confusion does not lessen when European cable-operators use 'fibre' or 'hybrid-fibre' in their marketing of Docsis 3.1, despite all-fibre networks having significant comparative benefits in almost every metric: available bandwidth, theoretical capacity, actual throughput, symmetrical speeds, latency, and jitter.

The correct use of 'fibre' in advertising materials is essential but differs from country to country. In France and Italy, only ISPs delivering fibre into the home or premises (FTTH/B) are permitted to use the term 'fibre' in advertising materials. In Italy, a labelling scheme, similar to the "traffic light system", enables consumers

¹ <https://www.ericsson.com/en/reports-and-papers/mobility-report/articles/mobile-broadband-indoor-deployment>

² <https://accesspartnership.com/wi-fi-is-the-best-way-to-address-capacity-demands/>



to clearly compare broadband services in terms of their performance and, potentially, environmental characteristics. The word “fibra” and ‘green’ labelling is reserved for FTTH/B, while ‘yellow’ refers to part fibre (e.g. FTTC) and ‘red’ to copper (ADSL) services³.

Improving general consumer awareness about the significant benefits of fibre (FTTH/B) will contribute to a faster deployment and take-up of fibre networks in Europe. This includes clear information on actual throughput, gigabit speed capability, symmetrical speeds, latency, and energy consumption (kWh/GB).

ELFA believes that guidelines should be considered at EU level to foster the involvement of the Member States across Europe and better align policy approaches to advertising broadband covering performance and environmental challenges as part of promoting the European Union’s ambition to bring fibre connectivity to all European citizens and businesses by 2030.

ELFA welcomes the new ‘fibre-ready’ label on a voluntary basis and certification schemes for new and majorly renovated buildings pre-equipped with fibre and fibre-ready infrastructure as defined in the Gigabit Infrastructure Act (GIA). We believe that the labelling scheme will create greater awareness among building owners and developers about the importance of access to fibre connectivity.

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The European Local Fibre Alliance ([ELFA](#)) is the shared voice from alternative and private and public local and regional fibre operators in the EU. ELFA's members represent more than 800 operators building fibre networks in both urban and rural areas, already reaching more than 50% of all European premises.



³ [https://www.wik.org/fileadmin/Studien/2020/Study - Identifying European Best Practice in Fibre Advertising - FTTH Conference.pdf](https://www.wik.org/fileadmin/Studien/2020/Study_-_Identifying_European_Best_Practice_in_Fibre_Advertising_-_FTTH_Conference.pdf)