

ANALYSIS OF THE PUBLIC CONSULTATION ON THE WHITE PAPER ON EUROPE'S DIGITAL INFRASTRUCTURE NEEDS

ONE PAGER WITH KEY TAKEAWAYS



The following analysis has been performed with the data extracted from the "Data & Figures" sections of the "White Paper Public Consultation analysis" available on Political Intelligence's website, alongside this one pager.

Note: No Answer (N/A) responses are not accounted in this one-pager, except for the analysis of abstentions presented in the first paragraph of the "General Conclusions". Percentages are referred to the total number of responses referring to the specific workstream and not to the total number of submissions considered in the analysis (data extracted from the sheet named "Data & Figures without N_A").

Disclaimer: The study reflects the assessment of Political Intelligence Brussels and does not represent the perspectives of its clients or other Political Intelligence offices located across Europe.

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General Conclusions:

- Most respondents have expressed limited interest in the proposals outlined in the White Paper. Across the four workstreams analysed, it is possible to observe a wide abstention from stakeholders' responses. Approximately half of the respondents have not provided feedback on the interconnection market (57%) and EECC's scope extension (47%). Abstention rates increase if we consider the other two workstreams: extension of Universal Service Obligations (77%) and the sustainability of digital services (65%).
- **A majority of those responding oppose the White Paper proposals:** This is consistent through three out of four categories analysed: (i) interconnection market, (ii) EECC's scope extension, (iii) extension of USOs. The only exception is the category labelled as "(iv) additional sustainability obligations", where no clear trend has been identified.
- Across all four categories in the White Paper proposals:
 - o 54% of the responses are critical.
 - o 30% of the responses are supportive.
 - o 14% of the responses are mixed or neutral.
- **The proposal for further intervention in the interconnection market is the most criticised** (67% would be against), followed by the extension of USOs to digital services (61%) and the EECC's scope extension (54%)¹.
- **The analysis of responses by type organization also suggests that opposition to the White Paper proposals is the predominant position of all types of stakeholders:** Across all seven stakeholder categories identified - (i) BXL-trade associations, (ii) National trade associations, (iii) Government/regulators, (iv) Civil society/NGOs, (v) Companies, (vi) Academics/Research Institutes, and (vii) Individual commentators - a majority of respondents oppose the proposals of the White Paper. The only exception being the extension of sustainability obligations, where some categories of stakeholder are supportive.

Main takeaways by category:

Workstream: Regulatory Intervention in the interconnection Market

- **Strong majority against further intervention:** A strong majority of respondents (67%) oppose further intervention in the interconnection market. On the other hand, only 28% of respondents could be considered as pro-intervention.

¹ Please note that percentages are referred to the total number of responses referring to the specific workstream and not to the total number of submissions considered in the analysis.

- **Not a single stakeholder group shows preference for further intervention:** All categories of stakeholders lean against interventionism. The category with the most divergence in the responses is the companies' category: 55% (17) against vs 45% (14) in favor. It is important to highlight that 12 out of 14 companies supporting a regulatory intervention are major telecom operators in national markets².
- **Trade associations and Civil Society/NGOs have the strongest position against interventionism:** More than 83% of NGOs and 70% of the trade associations would align against further regulation of the interconnection market. This position is especially strong among Brussels-based trades (approximately 90%).
- **Governments and Regulators align with the views of the majority:** Of the 11 responses from governmental or regulatory authorities, only 2 show preference for more interventionism.

Workstream: Extension of the EECC's Scope

- **A majority of respondents are against the extension of the EECC to cloud:** 54% of the total respondents argue against cloud being brought into the EECC framework. Brussels-based trades and civil society organizations lead this stance, with more than 77% of the stakeholders being against it.
- **Proponents of convergence are primarily companies and national trades:** 42 of the 50 stakeholders that show preference for the extension to cloud come from these two categories. At the individual company level, major national telecom firms are the primary supporters of the EECC's scope extension. Additionally, most national associations backing the extension have a significant presence of telecom companies among their members. Therefore, very few respondents from the other categories support this view, and not a single stakeholder group is supportive of convergence.
- **Only one governmental authority sides clearly with the extension:** From the 12 responses received, only Cyprus clearly argues for the extension of the EECC to cloud. Of the rest, 50% (6 responses) are against an extension and 42% (5 responses) have mixed or neutral views.
- **Half of neutral responses recognise the concept of convergence but urge caution on extending the EECC's scope:** Among stakeholders spelling a high-level and neutral position, 7 out of 15 (47%) support the White Paper's vision of telco-cloud convergence while pushing back or urging caution with respect to an extension of the EECC's scope.

Workstream: Extension of Universal Service Obligations

- **A majority of respondents are against the extension of USOs to digital services:** Almost 63% of the stakeholders are against the extension. This is the preferred position for an overwhelming number of Brussels trades (92%) and a large majority of Governments (75%) dealing with the topic in their submission.
- **Proponents of extension of USOs only account for 11% of the respondents:** Proponents of the extension are primarily companies and national trades. Even when considering these two categories together, only 18% express strong support for an extension, while approximately 29% hold mixed views on the matter.

² The complete list is the following: Bouygues Telecom, Deutsche Telekom, KPN, MASORANGE, NOS, Open Fiber, Orange, Tim, Telefonica, Telenor, Vodafone and Wind Tre.

Workstream: Additional sustainability obligations for digital services

- **Contrary to the rest of proposals, a majority of respondents would welcome more obligations but this falls short from an absolute majority of respondents:** Only 38% of the respondents would favour more obligations linked to sustainability. However, this is the weakest majority of all analysed, as the opposition to more rules reaches a 31%, and those with neutral or mixed views account for another 31%.
- **Governments and regulators are the main supporters of additional sustainability obligations:** An overwhelming number of the respondents of this category (82%) welcome an extension of the obligations.
- **A majority of Brussels-based and national trades are against more obligations:** It is the only stakeholder group that shows a majority against the extension. Companies also lean towards more rules or have more mixed views.