EUROPEAN WIRELESS INFRASTRUCTURE ASSOCIATION

EWIA response to the Draft BEREC Report on Infrastructure Sharing as a lever for ECN/ECS Environmental Sustainability

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European Wireless Infrastructure Association - EWIA

EWIA – the European Wireless Infrastructure Association – welcomes the opportunity to share its views on the Draft BEREC Report on Infrastructure Sharing as a lever for ECN/ECS Environmental Sustainability. This is a very important subject for our members: the TowerCo business model that is developing in Europe leads to an efficient passive infrastructure sharing, with substantial benefits for Europe in terms of sustainability that have been demonstrated by a recent study by EY-Parthenon "The sustainability contribution of the European TowerCo sector", available here.

EWIA appreciates to have been associated to the stakeholders' workshop organized by BEREC Sustainability Working Group and the fact that our input to the workshop is well reflected in the draft report.

Since the draft Report emphasizes that "*the benefits of infrastructure sharing have to be weighted against potential technical, legal and regulatory issues in terms of service, competition and investment*", EWIA would like to emphasize that the neutral host model followed by its TowerCo members is a successful way to reap the sustainability benefits of passive infrastructure sharing while at the same time delivering significant economic savings, developing new sources of financing and fostering competition, market entry and innovation, as illustrated in a recent study by EY-Parthenon "The economic contribution of the European TowerCo sector", available here.

EWIA supports the conclusions to consider the environmental dimension in future work by BEREC on infrastructure sharing. We remain at BEREC's disposal to contribute further to such work and share the experience of our members where needed.