EWIA EUROPEAN WIRELESS INFRASTRUCTURE ASSOCIATION

Contribution to the call for evidence on the Digital Networks Act

July 2025

European Wireless Infrastructure Association - EWIA

EWIA – the European Wireless Infrastructure Association – welcomes the opportunity to contribute to the call for evidence on the Digital Networks Act (DNA) launched by the European Commission.

EWIA is the European trade association of independent Towercos which provide open access to their shared wireless infrastructure through a neutral host model. This 'neutral host' model is now the prevalent model in Europe, where our 11 members operate 251,000 wireless infrastructure assets in 20 countries. We serve all mobile network operators (MNOs) and hundreds of other wireless operators enabling better communications for end users in the communities we cover.

EWIA members are committed to enabling better and smarter connectivity across Europe through the investment in and the delivery of worldclass neutral-hosting wireless infrastructure and associated facilities. Until now EWIA members have invested nearly 50 billion euros to support the EU's path to the Digital Decade.

General observations

EWIA welcomes the upcoming Digital Networks Act initiative and its objective to improve access to secure, fast, and reliable connectivity, which as stated in the call for evidence is essential for consumer welfare, industrial competitiveness, security, resilience and environmental sustainability across Europe.

Out of the topics to be primarily addressed in the DNA according to the call for evidence, EWIA supports the objective of simplification and would like to share more detailed views on access regulation.

No additional regulation is needed for a well-functioning and pro-competitive neutral host TowerCo market

The neutral host TowerCo sector is well-functioning and pro-competitive. The average number of wireless network operators hosted by neutral host TowerCos is 2.1, compared with only 1.3 for towers that are still operated by MNOs and MNO subsidiaries. This avoids

unnecessary duplication of infrastructure, which in turn provides a series of economic and environmental benefits:

- Sharing towers with multiple tenants reduces overall cost. A typical location of a wireless network operator ("point of presence") managed by EWIA members is circa 40% more efficient than one managed by an MNO, resulting in projected economic savings of 31 billion euros across Europe between 2019 and 2029 to the benefit of the subsequent value chain including end consumers.
- Divesting infrastructure assets to TowerCos brings MNOs upfront capital (amounting over 53 billion euros between 2019 and 2024), which they can reinvest in their networks to improve broadband coverage and accelerate 5G rollouts. This specially makes network deployment in rural areas viable and helps to address the digital divide with potentially more choice for consumers.
- The open, neutral and sharing-driven TowerCo model will result in 109,000 fewer towers being built by 2030, which will avoid almost 4 million tons of CO2 emissions - the equivalent of taking almost 200,000 cars off the road each year.
- By enabling timely and cost-effective access to their sites, neutral host TowerCos facilitate market entry and promote infrastructure-based competition, which leads to more consumer choice.

When it comes to access regulation, EWIA highlights that neutral host TowerCos operate a wholesale-only model and have every incentive to share their infrastructure. In response to the consultation, we would like to make the following comments:

- SMP-based rules aim to open up markets by controlling prices when one player has significant market power, while the GIA uses equal rules for everyone, allowing companies, including TowerCos, to reach fair deals through commercial negotiations.
- If SMP is not designated at EU level, which would de facto remove ex-ante regulation, this should follow from finding that effective competition has been achieved and that the existing symmetric and complementary rules are sufficient. No additional symmetric obligations should then be introduced to avoid any distortion due to unmerited over-regulation.
- While EWIA members are subject to the GIA (and previously BCRD in some national transpositions), to the EECC and competition law, there is no evidence of market failure and no track record of regulatory intervention. To the contrary, access to neutral host TowerCos' infrastructure is not restricted, as openness and infrastructure sharing are at the heart of the neutral host TowerCo model.

Since the neutral host TowerCo sector is evidenced by numerous market entries, is well-functioning and provides a number of key benefits to the European economy and society, additional regulation of neutral host TowerCos is not warranted.

EWIA's recommendations on how the DNA can additionally facilitate infrastructure deployment and improve connectivity

While the GIA is a good first step to address deployment challenges (permitting, access to land / buildings), more needs to be done as barriers to deployment persist in several areas, slowing down deployment. To maximize their positive contribution to Europe's connectivity and competitiveness, EWIA members call on policymakers to encourage an investment-friendly environment which:

- Protects from opportunistic and speculative behaviours regarding access to land.
- Facilitates permitting procedures.
- Facilitates access to energy solutions, including by ensuring that tower sites are prioritised in access to low voltage grid.
- Increases transparency on emissions and site certificate data when required to expedite infrastructure deployment

EWIA members remain committed to contributing to the achievement of the EU connectivity objectives and to the roll-out of the digital infrastructure Europe needs for the benefit of its society and competitiveness.

As a key contributor to and enabler of the deployment of Europe's digital infrastructure, EWIA will follow closely the relevant developments related to the Digital Networks Act and is fully available to engage with policy-makers on the best ways to further deploy across Europe a fast, secure, and resilient digital infrastructure.