

## **Non-paper on the revision of the Broadband Cost Reduction Directive (2014/61/EU) – Denmark, Sweden and the Netherlands**

March 2022

This non-paper provides input for the revision of the Broadband Cost Reduction Directive (BCRD) based on our experiences with the current BCRD. In support of reducing broadband rollout costs EU-wide, we advocate cost-efficient and effective measures.

- We welcome the Commission's efforts for the revision of the BCRD. This has the potential to make important strides towards improving digitalisation, a pre-requisite for the competitiveness of the EU.
- We support exploring topics such as "green connectivity" and sustainability in the revision of the BCRD framework.

However,

- A balance needs to be struck between harmonisation and flexibility for MS to determine internal policy according to their respective national situation. There should be a clear problem analysis and (implementation) cost-benefit analysis underlying proposed measures - harmonisation is not always an effective solution in itself.
- We remain committed to ensuring fast and streamlined (digital) procedures for permit granting. EU legislation can play an important role in ensuring this. Yet, differences in national systems of public administration, such as the autonomy of local authorities, should be taken into account; especially with regards to permit granting procedures. Since the details of permit granting procedures vary greatly within MS, a variety of flexible and alternative solutions may be needed. We propose that tacit approval remain a voluntary measure.
- With regards to the Single Information Point the following should be considered:
  - Maintaining flexibility on the inclusion of new functionalities and/or information.
  - A measure that would oblige MS to store data on all infrastructure, redesign existing systems or perform an outright (public) mapping of existing infrastructure might be suboptimal as regards cost-efficiency.
  - MS should maintain the possibility to be exempt from (certain) information obligations pertaining to national security.
- As the above shows, flexibility is needed to be able to implement the coming proposals. Therefore, we advocate that new proposals from the EC remain in the form of a directive.