

Written comments from Slovenia

Revision of the Guidelines on State aid for broadband networks

Slovenia welcomes the Commission proposal of the Guidelines on State aid for broadband networks.

Slovenia would like to ask the Commission for additional clarifications and propose some modification to the draft guidelines:

1. Defining a Gigabit network

- The 2030 »Digital Compass« and Policy Programme »Path to the Digital Decade« establish Gigabit network as one of the digital targets whereas draft Guidelines differentiate between fixed ultrafast access networks, mobile access networks and backhaul networks.

For the purpose of providing clarity and consistency, we propose to include the definition of the Gigabit network in the new Guidelines and to provide a link between the Gigabit network and fixed ultrafast access networks and, furthermore, to explain the relationship between these two types of networks

2. Next generation network (NGN)

- The Guidelines in force contain definition of the NGN whereas the draft Guidelines abandons the reference to the NGN.
- For the purpose of providing clarity and consistency, we propose to include clarification on the relationship between, on the one hand, the NGN and, on the other hand, the Gigabit network and the fixed ultrafast access network in the new Guidelines.

3. Satellite networks

- In our view, new Guidelines should clearly and unambiguously define satellite networks as one of the types of the fixed ultrafast access networks.
- Last sentence in point 22 of the draft Guidelines should read as follows: »Wireless networks such as certain fixed wireless access networks and in the future satellite networks may also be able to provide ultrafast broadband services.«
- Consequently, we propose to supplement Annex I regarding criterion and methodology of the mapping by including satellite services.

4. Coupons - vouchers for the Connectivity

- Second sentence in point 191 of the draft Guidelines should read as follows: »Eligible costs may be the monthly fee, the standard set-up costs and the end-user's necessary terminal equipment (modem/router) and other necessary equipment for access to the internet. « The proposed supplement refers to the equipment for receiving satellite signals. In our view, conditions for defining eligibility of costs should be technology neutral and should be designed in a way that all available technologies shall be become eligible under the new Guidelines.

- We propose that point 200 of the draft Guidelines should read as follows: »Connectivity voucher schemes will be considered to have limited negative effects on competition if they are limited in time to a reasonable period not exceeding two five years.« In our view, in the medium or even long term, access to the internet via satellite shall become and remain the only or, at least, the most effective and appropriate option for broadband access for households in remote areas with difficult terrain configuration. However, at the current state of the art, satellite internet is significantly more expensive in comparison with access via other fixed broadband networks. Therefore, we suggest to extend the period of the connectivity coupon scheme from 2 to 5 years.

5. Private extension of the supported network

We propose to the EC to include the possibility of the private extension of the supported network as this is a common question and problem in further development of the network.

6. Transparency obligation

We believe that the transparency obligation (publication of each individual aid award exceeding 100.000 EUR) represents an unnecessary administrative burden do the MS and should be set at the 500.000 EUR, as in GBER.

We would appreciate if the Commission would publish the additional explanations provided to MS in the form of Frequently asked question.

Ministry of finance - Sector for monitoring State Aid

Slovenia