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## **PRELIMINARY CONTRIBUTION FROM FINLAND regarding the Revision of the Guidelines on State aid for broadband networks**

The Commission has invited the Member States to submit written comments on the revision of the guidelines on state aid for broadband networks ("broadband guidelines"). The following preliminary comments are the result of consultations between competent ministries and stakeholders subject to the approval of the Finnish parliament.

### **General remarks**

Finland supports the initiative to revise the broadband guidelines. Finland considers that it is important that the rules support the development of broadband networks for the EU's digital transition while ensuring that private investments are not crowded out. Finland supports the proposal to amend the guidelines in accordance with the principle of technology neutrality, which means that no technology is prioritized. Finland welcomes that the proposal gives an opportunity to see the projects as a whole but also sees that the beneficiary's obligations should always be appropriate in relation to the objective pursued.

Finland welcomes the fact that the guidelines take into account the general prohibition of granting aid to undertakings in difficulty and specify the concepts of public consultation and open selection procedure.

Finland sees that connections to market failure areas, or so-called white and grey areas, would be secured primarily and that the speed limits need to echo the EU's objectives so that the publicly supported network would not constitute a market failure itself.

Finland would also like to point out that the proposed speed limit indicating a market deficiency in the fixed network (1000/200 Mbit/s) can still be considered disproportionately high at this stage of development, as such speed limits are only offered on a commercial basis to a fairly limited. Finland also draws attention to the fact that according to the proposal, the speed limit would also be applied in the so-called black areas and highlights that supporting black areas may slow down or displace commercial investments.