

## Response to public consultation on Horizontal Block Exemption Regulations and Horizontal Guidelines

*European Wireless Infrastructure Association – EWIA*

### About us

We are the **European Wireless Infrastructure Association**, the European trade association of independent wholesale wireless infrastructure providers. Our members invest in and operate wireless infrastructure essential to the delivery of mobile voice, wireless broadband and other wireless networks.

EWIA is a well-established presence in Europe with **ten members operating across sixteen European countries** who develop, acquire and operate communication towers together with investment in the fibre-connected small cell networks in buildings and on city streets needed for 5G. Together, our members have invested and operate over €100bn of wireless infrastructure assets globally and operate a portfolio of over 150,000 assets in Europe, raising the share of independent wireless infrastructure in Europe to 35%.

EWIA advocates policies that **encourage the network infrastructure investment and deployment**: this is necessary to make advanced wireless broadband available everywhere for consumers, businesses, health care, public safety and the countless other sectors that rely on always-on wireless connections. This includes ensuring better and faster connectivity in rural areas.

### A pro-competitive solution to infrastructure sharing

EWIA welcomes the revision of the Horizontal Block Exemption Regulations and Horizontal Guidelines as a way to foster competitiveness and innovation in the EU.

EWIA members believe that our industry could be a valuable partner to EU policymakers and play a central role in facilitating pro-competitive solutions to infrastructure sharing. In particular EWIA

members enhance Europe's connectivity by investing long-term low-cost capital in high-quality shared telecom infrastructure. Some of the benefits linked to our business model are, for instance:

- Independent neutral host infrastructure unlocks new investment that will be critical to 5G;
- Independent neutral host infrastructure is twice as productive as vertically integrated infrastructure, leading to better connectivity;
- Neutral host reduces infrastructure costs, whilst offering a pro-competitive solution to infrastructure sharing.

As a matter of fact, independent wholesale players invest in more substantial assets, designed for use by multiple network operators from the outset. They lower the economic threshold for rolling out new coverage with just one anchor customer and reduce the total cost of ownership for that customer by anticipating future sharing by other wireless operators. Independent neutral host infrastructure facilitates competition and allows all players to access the infrastructure easily and quickly. Sharing infrastructure results in fewer barriers to entry or expansion.

Therefore, independent neutral host infrastructure is pro-competitive by nature and encourages smaller wireless operators and innovative new applications (e.g. fixed wireless access, Internet of Things), and in addition to the three or four mobile network operators, independent neutral host infrastructure supports hundreds of other wireless networks.