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Subject: **Comments of the Ministry of Public Administration on »GBER« in a public consultation**

Dear all,

At the Ministry of Public Administration, the Information Society Directorate, which also covers the area of broadband infrastructure under its responsibility, following a thorough review of the draft Commission Regulation (EU) amending Regulation (EU) No. 651/2014 declaring certain types of aid compatible with the internal market in application of Articles 107 and 108, we propose the following.

The proposed new definitions in paragraphs 174 to 179 add significantly to the clarity of regulation in the area of broadband infrastructure. However, as they relate to aid under financial products supported by InvestEU, but not to aid under Article 52 of the GBER Regulation, the content becomes unclear. We therefore propose that the terminology should be unified and that the white, gray and black areas should be properly transposed into the text of Article 52.

In order to improve the clarity of the text of the GBER Regulation, we also propose to clarify the relationship between the basic broadband network and all types of NGA networks (fast, ultra fast) and the possibility of financing in the case of the existence of individual types of networks. Frequently Asked Questions (paragraph 223) partly explains this, but in the interests of clarity of a legislative act, it is appropriate that this is regulated in the legislative act itself.

Yours sincerely,




Marjan Turk
Acting Director-General