Consultation response – cover letter/additional input

The Telecom Infra Project ("TIP") welcomes the consultation on the European Strategy for Data. We thank the European Commission for its efforts to engage with industry in planning the initiatives outlined in this Strategy.

We support the European Commission's plans to create a genuine single European data space and single market for data, based on European values. We also support the creation of a cloud services marketplace, which has the potential to boost the connectivity of underserved areas, including through WiFi and OpenCore-based technologies. In particular, we welcome the focus on developing sectorial spaces in strategic areas such as manufacturing, agriculture, mobility and skills, and suggest that Smart Cities would be a valuable addition.

TIP is committed to contributing to the European Commission's efforts and looks forward to being a constructive partner on this journey of digital transformation. We suggest that the data strategy would benefit from an additional focus on enablers — the technologies and projects which will be key in realizing the ambitious initiatives outlined in the strategy. Improving Europe's connectivity will play a key role in this process.

What is TIP?

The Telecom Infra Project (TIP) is a collaborative community evolving the telecom infrastructure that underpins global connectivity to ensure the seamless, reliable, high quality connectivity we need.

Launched in 2016, TIP's mission is to accelerate the pace of innovation in next generation telecom networks by designing, building, testing, and deploying standards-based, open and disaggregated end-to-end solutions. Several hundred member companies and institutions from around the world and from all backgrounds are coming together to build a more vibrant, collaborative telecom ecosystem that delivers solutions. They include hardware manufacturers, software makers, mobile networks, edge service providers, integrators, start-ups and many others involved in the telecommunications supply chain.

TIP has a heavy presence in Europe, with member companies driving initiatives at member state and European levels. Our European members include Telefonica, BT, Orange, Deutsche Telekom, Vodafone, European Space Agency, Nokia, Telenor, Cork Institute of Technology, Ghent University-IMEC, Schneider Electric and SNCF, among others.

Improving Europe's connectivity to achieve data economy

For the EU to lead in the data economy it needs to scale up its traditional telecommunications infrastructure. The current highly concentrated telecoms market has enabled wide deployment of mobile networks and wireless connectivity. However, it has also resulted in certain rigidities in telecom equipment markets and in certain cases a lack of interoperability and lack of diversification in the market, which impose costs on mobile network operators (MNOs).

Current telecommunications network infrastructure requires significant upgrades to keep up with increasing network demand which will be essential in realizing the objectives outlined in the Data Strategy.

A primary focus area of the Telecom Infra Project work is accelerating innovation to help develop new technologies and reimagine the traditional telecommunication network infrastructure by creating end-to-end disaggregated network solutions. TIP has strong relationships with MNOs in Europe and is designed to help them build better networks.

Cost reduction and avoiding over-dependency

We support the Commission's recognition of data being an essential resource for start-ups and small and mediumsized enterprises in developing products and services. More generally, the decisions taken by European policymakers in realizing the initiatives outlined in the Data Strategy will define the competitiveness of the EU's market for the years to come.

We recommend that, in building up a competitive market and robust European capabilities, the Commission consider

solutions based on open and disaggregated technologies. Networks will benefit from more flexibility and resiliency. This will allow the EU to strengthen both existing capabilities, and build a future network capable of withstanding sudden shifts in the requirements of its networks, for example, in the context of a global pandemic.

Flexibility from network disaggregation allows operators to optimize each component of the network, which will increase their ability to service the European market.

Cloud services marketplace boosting connectivity in underserved areas

We welcome the Commission's focus on creating a cloud services marketplace. This should help to improve connectivity in both unconnected areas, which are mainly found in rural areas, and under-connected areas.

In the Data Strategy, the Commission correctly recognises that one of the challenges in creating the data spaces lie in the current data infrastructures and technologies set ups. Problems persist on both the supply and demand side of cloud.

To this list of issues we would add wider issues of connectivity enabling the scaling up of European cloud technologies and vendors and recommend that the Commission looks at this more closely through a study or another appropriate instrument. The study should look at how a solution such as a multi-vendor RAN ecosystem can be critical in addressing the complexities of greater network demand using cost-effective solutions.

Sectorial spaces in strategic areas

We welcome the Commission's focus on sectorial spaces in strategic areas such as manufacturing, agriculture, health, mobility and skills. Through our various Project Groups, we are developing best practice and guidelines for different Smart City applications. We stand ready to expand our research to support the Commission's sectorial focus areas under the Data Strategy.

We look forward to contributing to the Commission's efforts on this, including through TIP's work on developing solutions across all areas of the technology stack, including access, backhaul, core, and services.

Final remarks

TIP looks forward to working with the European Commission on the data strategy initiatives and to promoting together an open, fair, diverse, competitive and trustworthy ecosystem.

We are available should you require additional information or clarifications.

Yours sincerely,

Attilio Zani Executive Director Telecom Infra Project