TELECOM INFRA PROJECT

Telecom Infra Project Response to Public Consultation on a Set of European Digital Principles

The Telecom Infra Project (TIP) welcomes the opportunity to respond to the European Commission's consultation on European Digital Principles. We particularly applaud the recognition in the consultation that high-speed and ubiquitous connectivity will be key in realizing the EU's digital targets such as digital education, but also digital health services, digital public services and administration, and human-centric algorithms.

We believe that it is important to recognize that fast, secure, reliable and ubiquitous connectivity should be both an end goal for Europe as well as an enabler of the other digital principles and ambitions set out by the European Commission. Without this level of connectivity, it will be difficult to attain the EU's digital ambitions such as growing AI capabilities, digital identity or telemedicine.

TIP therefore recommends that the following principle be enshrined in the set of digital principles: "Excellent and secure connectivity for everybody and everywhere in Europe is a prerequisite for a society in which every business and citizen can fully participate," as set out in the 2030 Digital Compass: the European way for the Digital Decade Communication. This principle would expand and clarify the existing proposed ones on "Universal access to internet services."

We would also urge the European Commission to consider the role that open and disaggregated technologies can and will play in ensuring fast, secure, reliable and ubiquitous connectivity across the EU. We provide additional detail below.

About the Telecom Infra Project

Launched in 2016, TIP is a community of diverse participants that includes hundreds of telecom companies, from hardware manufacturers and software makers to mobile network operators, edge service providers, system integrators, start-ups and many others involved in the telecommunications supply chain. TIP and its participants work together to design, build, test, and deploy end-to-end solutions that are open, disaggregated, and standards-based. Over 500 participant

companies and institutions from around the world and from all backgrounds have come together at TIP to build a more vibrant, collaborative telecom ecosystem that delivers solutions.

TIP has a heavy presence in Europe, with participant companies driving initiatives at both 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.

Open and Disaggregated Network Architectures Provide Operators with Flexibility and Stimulate Competition

Open network architectures are designed to permit operators to disaggregate traditional components of their networks, such as separating a mobile "base station" into its constituent functions. Disaggregating network infrastructure into smaller elements, each connected across standards-based interfaces, provides operators with flexibility as they deploy their networks. This is particularly important as 5G networks are seeing ever-greater amounts of network technology being shifted either from the network core closer to the edge, or vice-versa, facilitating performance improvements in lower latency and lower energy consumption, among other benefits.

By using standards-based interfaces and specifications from groups like 3GPP or the O-RAN Alliance, and by adhering to productization, testing, validation, and delivery requirements from TIP, the result is a more competitive ecosystem that provides operators with flexibility to mix-and-match equipment from different vendors.

Open and disaggregated technologies in the EU Digital Principles

For the EU to lead in the digital 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 – both on connectivity but also on the digital priorities like AI, public sector digital transformation and digital upskilling – outlined in the 2030 Digital Compass.

TIP looks forward to supporting the European Commission's initiatives on digital principles and creating together a fast, reliable secure and ubiquitous connectivity ecosystem.

Yours sincerely,

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Telecom Infra Project