BCO Network

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The emerging requirements for SIPs under GIA

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Implementing the GIA SIP requirements

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Agenda

1	Scope of GIA obligations
2	Overview of status quo in SIP implementation
3	Insights from ongoing implementation in Ireland
4	Benchmarks

Obligations relating to the SIP under the GIA

Scope of obligations wrt existing infrastructure

- SIP for existing infrastructure was previously optional for MS, now mandatory
- Compared with BCRD: scope of physical infrastructure to be included in SIP for existing infrastructure is extended
  - Additional information providers:
    - Previously ECN, utility and transport
    - Now also providers of associated facilities e.g. towercos and public sector bodies
  - Additional types of physical infrastructure to be included:
    - previously network elements such as ducts, towers, poles
    - Now also (where owned or controlled by public sector bodies) non-network elements including buildings, traffic lights, billboards and toll frames, bus and tramway stops, metro and railway stations
    - NB while of interest for mobile deployment, land is not a PI and thus not required to be included in a SIP
- Scope of information to be provided is also extended:
  - Addition of georeferenced location and route
  - Option to include info regarding occupation level of PI

Obligations relating to the SIP under the GIA

Potential exemptions from the requirement to provide info to the SIP

- **Article 4(7) GIA notes that obligations regarding the provision of information about existing physical infrastructure shall not apply where:**

  (a) PI is **not technically suitable** for the deployment of VHCNs or associated facilities.

  (b) The obligation to provide information about certain existing types of PI would be **disproportionate**, based on a cost-benefit analysis conducted by Member States and a consultation with stakeholders;

  (c) PI is **not subject to access obligations** in accordance with Article 3(10) i.e. reasons of architectural, historical, religious or environmental value or for reasons of public security, defence, safety and health

- **Article 3(5) GIA also sets out several grounds on which operators and public authorities could refuse access to specific infrastructure on a case-by-case basis, but this does not exclude the requirement to include information about that infrastructure in the SIP unless excluded on one of the grounds listed above**

Obligations relating to the SIP under the GIA

Obligations on PI owners and enforcement mechanisms

- For undertakings / physical infrastructure which is not excluded from SIP inclusion under one of the three grounds listed, the following obligations apply:
- Network operators and public sector bodies should make available at least the minimum information and (where applicable) additional information via a SIP and in electronic format – and must promptly make available any update to that information.
  - Georeferenced location and route
  - Type and current use of the infrastructure
  - Contact point
- In the event of non-compliance, competent authorities may request the missing information be made available in electronic format via the SIP within 10 working days of receipt, without prejudice to the possibility for MS to impose penalties for non-compliance

Obligations relating to the SIP under the GIA

Manner of implementation of SIP for existing physical infrastructure

- SIPs must make available appropriate digital tools such as web portals, databases etc i.e. the information should be **digitised** and **accessible through digital means**
- There are no limitations to the number of SIPs i.e. there could be multiple
- MS may interconnect existing or newly developed tools (i.e. not mandatory); BUT
- There should be a **single national digital entry point – with common user interface** to ensure seamless access to the digitised SIPs

Overview of current (BCRD) SIP implementation

Status of SIPs for existing physical infrastructure – selected countries

Organisation name	Is there an established electronic SIP? Does it cover fixed or mobile assets or both?	Does the SIP include information from network operators other than assoc. facilities?	Does the SIP include information from providers of associated facilities such as towercos?	Does the SIP include information from public bodies?	Is the information georeferenced?	Is the share of used or reserved vs spare capacity in the physical infrastructure transparent to the user of the database?	How often is the information on the SIP required to be updated?
Austria	Yes, for fixed and mobile	Yes		Yes, e.g., if the public body has its own communication infrastructures and offers them to the public	Yes	No	Continually
Denmark	De facto yes (separate systems for fixed and mobile)		Only de facto (masts are not included but the antennas on the masts).	Only in case there is already an antenna built on it	Yes	No, as it includes only antennas not the masts itself	Not relevant
France	No, several information points	No	Information about towers on SIP by frequency agency ANFR		Yes	No	Continually, upon request at Orange
Italy	Yes, for fixed and mobile	Yes	Yes		Yes	Not mandatory, but provided voluntarily by towercos	Continually
Netherlands	De facto yes (separate systems for fixed and mobile)	No	For mobile only de facto as the antenneregister only registers the antennas but not the masts themselves	Only in case there is already an antenna built on it	Yes	No, as it includes only antennas not the masts itself	Not relevant
Poland	Yes, for fixed and mobile	Yes	No	Yes	Yes	Yes?	At least once per year
Portugal	Yes, for fixed and mobile	Yes	Yes	Yes	Yes	Yes (optional)	Continually
Spain	Yes, but the SIP only provides contact details to ask for the information	Only contact details		Only contact details	No	No	Continually
Sweden	SIP does not store the actual information about the infrastructure, but metadata about the infrastructure.	Obligatory for applicatants of state aid	Voluntary	Voluntary	No	No (but can be included)	Continually, but voluntary updates

Overview of current (BCRD) SIP implementation

Physical infrastructure currently included in the SIP – selected countries

Organisation name	For what types of physical infrastructure (ducts, poles, masts, towers, buildings, other facilities able to host small cells etc.) is information provided by the SIP?								
	Ducts	Poles	Masts	Towers (telco owned)	Towers (towerco owned)	Public rooftops	Public land	Street furniture	Other (please provide details)
RTR (Austria)	1	1	1	1		0	0	0	
DEA (Denmark)	different database than the mobile one	0	Only indirectly through the antennas	Only indirectly through the antennas	Only indirectly through the antennas	0	0	0	
Orange (France)	0	0	0	1, included in SIP by ANFR	1, included in SIP by ANFR	0	0	0	Since there is no real SIP, this information on ducts, poles etc is available at Orange but not in a data base hold by ARCEP
AGCOM (Italy)	1	1	1	1	1	0	0	0	
NL	different database than the mobile one	0	Only indirectly through the antennas	Only indirectly through the antennas	Only indirectly through the antennas	0	0	0	
UKE (Poland)	1	1	1	1	0	0	0	0	
ANACOM (Portugal)	1	1	1	1	1	0	0	0	
CNMC (Spain)	0	0	0	0	0	0	0	0	there are municipalities with extensive georeferenced SIP
PTS (Sweden)	0	0	0	0	0	0	0	0	Voluntary; no exact location collected

Overview of current (BCRD) SIP implementation

Main themes and gaps with respect to GIA on SIPs

- Although SIPs for existing infrastructure under the BCRD were optional, they exist in many MS
- However, the degree and nature of implementation of SIPs for existing infrastructure under the BCRD varies significantly.
- Austria, Italy, Poland, and Portugal have established electronic SIPs covering both fixed and mobile assets. Denmark and the Netherlands have separate SIPs for fixed and mobile assets
- France has one SIP run by Orange and another one by the frequency agency ANFR, while Spain's SIP only includes contact details and Sweden SIP only includes metadata about the network infrastructure
- In Italy and Portugal, the national SIPs include information from towercos. In France, a SIP by frequency authority ANFR includes georeferenced info about towers. The SIPs in Denmark and the Netherlands collect information about antennas, not masts themselves.
- There are significant gaps regarding information about public sector assets. However, there is information available from general (not telecom-specific) sources regarding building ownership incl. public buildings e.g. in Denmark and Sweden, while data regarding street furniture is being integrated in the German SIP
- SIPs in Austria, France and Portugal are updated continually, in Denmark quarterly (incl. Planned roll-out in the next 2 years).

Considerations when implementing the SIPs for GIA

Insights from ongoing implementation in Ireland

- As the scope of obligations under the GIA is very wide, attention is needed to evaluating exemptions to ensure that information obligations are proportionate and will genuinely be useful in supporting the deployment of fixed and mobile infrastructure
- WIK is currently supporting the Irish authorities with the implementation of GIA requirements regarding the SIP
- Key insights from the ongoing process:
  - **Steering group** involving Govt, NRA and stakeholders (including public authorities, telcos, towercos, utilities etc) provides forum for ongoing dialogue
  - **Survey of stakeholders** (Physical Infrastructure owners and access seekers) has proved valuable in identifying key infrastructure for inclusion as well as exclusions based on grounds of disproportionality or technical unsuitability
  - **Benchmarks** inform options for SIP solutions and associated cost for deployment and maintenance, ranging from minimalist (involving multiple SIPs) through to maximalist (all information in the same source)
  - **Mapping of existing potential SIPs**, structured interviews with SIP owners and consideration of the **scope to extend existing SIPs** has proved helpful in identifying solutions which could be realistically and efficiently applied in the short term, while leaving room for greater interconnection / consolidation of information sources where warranted going forwards
- Consultations pending - no final decisions taken

Considerations when implementing the SIPs for GIA

Approach to assessing proportionality in Ireland

Obligation to provide information is "disproportionate, on the basis of a cost-benefit analysis [...] and a consultation with stakeholders."

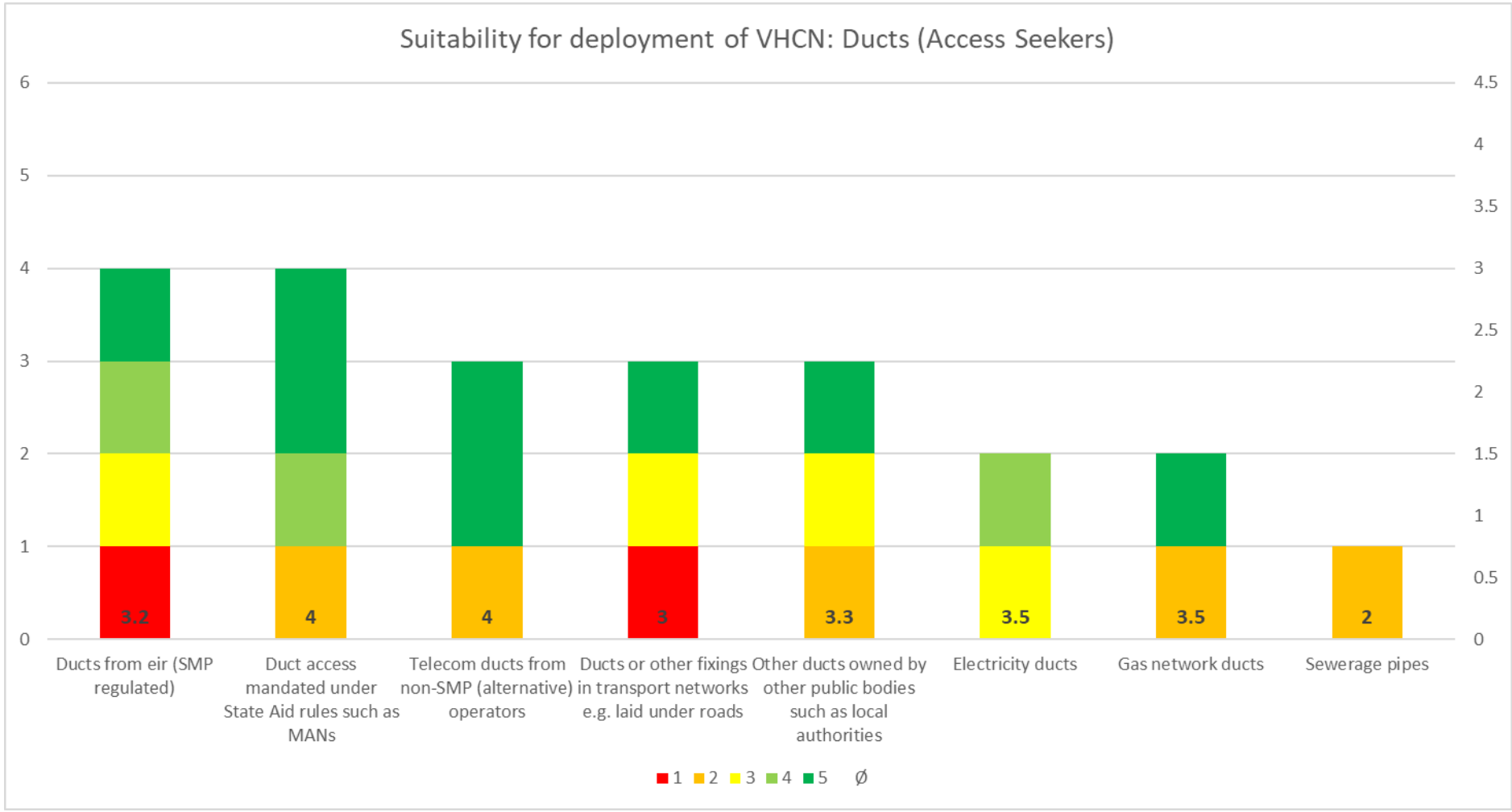
- Costly Mapping: Relevant asset mapping not available and expensive to create.
- Low Demand: Access requests expected to be very low.

Assessment Approach:

- Benefits: Evaluated based on current and future demand (from questionnaire).
- Costs: Assessed based on information availability, mapping complexity, and existence of alternative information sources e.g. on public street maps.

Considerations when implementing the SIPs for GIA

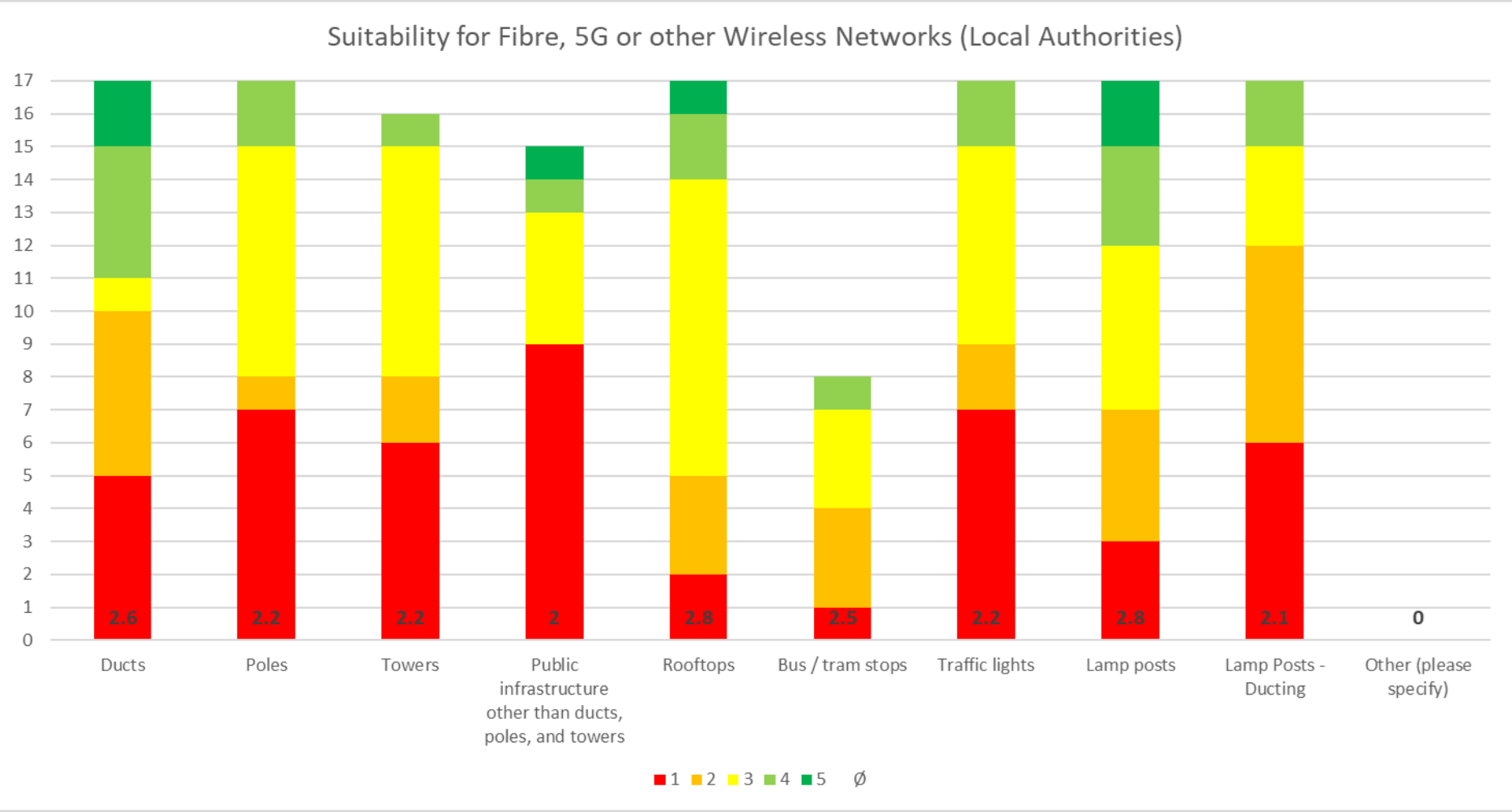
Insights relevant to assessing suitability of physical infrastructure



- Illustration from responses to the questionnaire regarding perceived suitability of different duct infrastructures by access seekers in Ireland

Considerations when implementing the SIPs for GIA

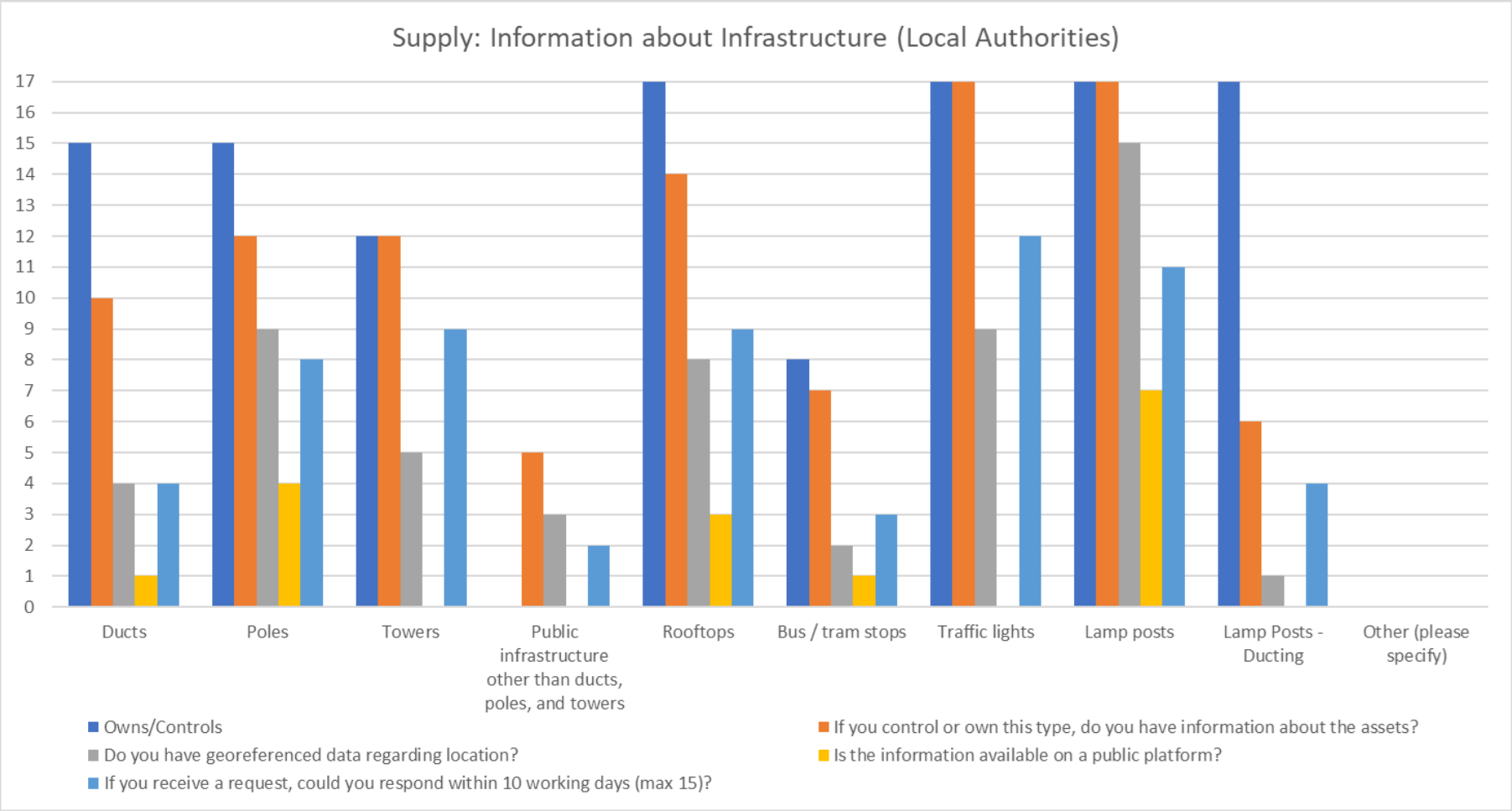
Insights relevant to assessing suitability of physical infrastructure



- Illustration from responses to the questionnaire regarding perceived suitability of different types of infrastructures by access providers (local authorities) in Ireland
- Access seekers signalled limited demand for many of these asset categories from LAs (except ducts, rooftops, water towers)

Considerations when implementing the SIPs for GIA

Availability of information by Local Authorities



- Illustration from responses to the questionnaire regarding availability of information regarding assets by local authorities

Considerations when implementing the SIPs for GIA

Operational considerations

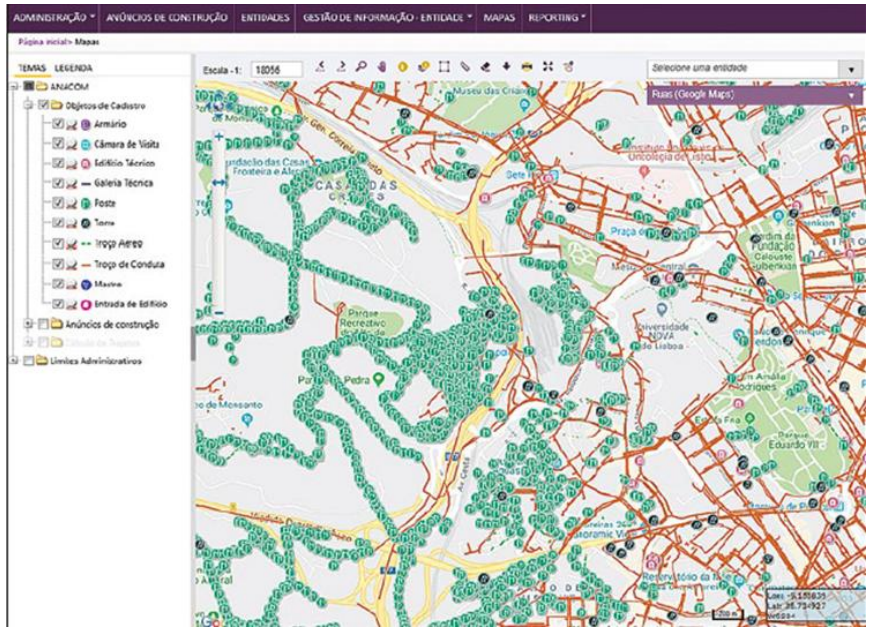
- After identifying the infrastructure that should be included in a SIP, mapping of existing information sources can help to determine which information sets are sufficiently complete (whether currently public or private) that they could be made available on a standalone basis vs those which are fragmented or currently unavailable and should therefore be integrated into a new SIP or added to an existing one.
- A progressive approach can also be envisaged, which leaves room for greater integration of information from different sources into a newly built or existing SIP over time.
- Other aspects to be addressed:
  - Responsibilities for implementing and maintaining the digital entry point, the SIPs, requirements e.g. regarding information to be included, updates
  - Enforcement measures: which body or bodies, how checks should be made, penalties etc

SIP on physical infrastructure

Maximalist illustrations – Portugal and Germany

SIIA in Portugal

- The SIIA in Portugal includes a state of occupation field
- SIIA also used for civil works coordination but with little take-up



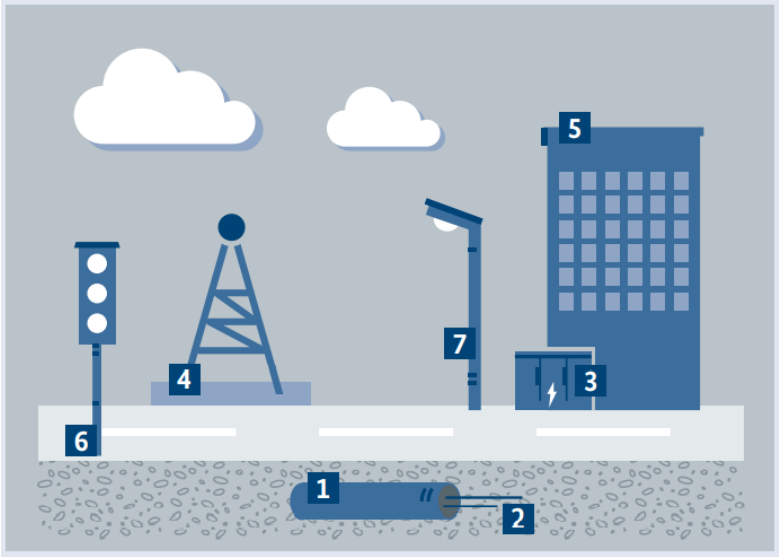
ISA in Germany (elements which are made available)

- Geo-referenced geometry data modelled as points, lines or areas;
- information on locational accuracy;
- information on the timeliness of data;
- industry affiliation of the infrastructures;
- information on the possibility of an installation using public funding for broadband roll-out;
- contact details of the person designated concerning the shared use of infrastructures (email address and phone number).

SIP on physical infrastructure – public infrastructure in Germany

Germany: SIP which includes public street furniture and properties

- Scope of infrastructures in the Infrastrukturatlas ISA:
  - Ducts (1)
  - fibre (2)
  - Distributions points (3)
  - Poles (4)
  - Access points like buildings (5)
  - public street furniture, e.g. traffic lights and street lights (6) + (7)
  - public properties (planned)
- all georeferenced
- Quarterly updates



PI SIP overview

- Although SIPs are already present in most MS, additional efforts are likely to be required to ensure digitised and georeferenced information is made available to meet the requirements of the GIA about public infrastructure suitable for VHCN network deployment, including rooftops, LA owned ducts, street furniture
- Challenge: find the right balance between providing information that will be genuinely useful for VHCN deployment while limiting the burden of providing digital and georeferenced information especially in cases where it is not readily available today
- Important to identify priorities of access seekers, and map existing information resources (and their potential for expansion) as well as identifying information gaps
- Solution could evolve, with greater integration over time.

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