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Onderwerp: Consultatie Wet informatie-uitwisseling bovengrondse en ondergrondse netten

L.S.

Colt welcomes the implementation of the Directive 2014/61/EU of the European Parliament and of the Council of 15 May 2014 on measures to reduce the cost of deploying high-speed electronic communications networks in the Netherlands legislation. Colt believes that this will promote and facilitate the roll out of high-speed electronic communications networks in that it will create a potential for a broader range of different type of infrastructure-based services for the consumer and business markets and a wider and deeper geographical reach for those services in The Netherlands. It should create more cost-effective solutions with improved underlying processes and praxis.

Colt operates across Europe, Asia and North America in providing services to businesses with our portfolio of network, voice and data center services which are delivered with industry leading customer service and security. Colt recently completed the acquisition of KVH, with headquarters in Tokyo and operations in Hong Kong, Seoul and Singapore. Today Colt's network directly connects 207 cities, with a further 49 Metropolitan Area Networks (MANs) and direct fiber connections into more than 22,500 buildings. Also, Colt operates 29 carrier-neutral data centers in Europe and in Asia-Pacific region. Our Global network spans three continents with Colt-owned infrastructure in 28 countries. This allows us to provide services to our customers across 86 countries.

With the WIBON and adjustments in Telecom Law implemented by mid-2016 in the Netherlands, we'd hope to be able to offer our services to more cities and to more buildings within those cities. We see two issues with the current implementation that would hamper the practicality of infrastructure access, we'd like to see them improved:

1. Article 5a.9 item 2

According to the Colt's experiences from the European countries where access to ducts is a proven and viable wholesale service, it is imperative that an offer contains functional interfaces, processes and support systems,

in particular that an access seeker can get information about where a duct is and its actual availability. For example, in Portugal the inventory database is so well updated that an operator can begin to deploy its fiber cable, 5 days after the first inquiry, if the on-line information shows that the duct is accessible and useful for the requested route.

Especially if a provider of public communications network services in turn will use this infrastructure in a tender procedure for offering services to a retail end-user, lead delivery times and certainty on capabilities are of utmost importance. The current maximum of 4 weeks for actual inspection –sometimes perhaps a first step in delivery- of the infrastructure is rather long and would preferably be reduced to 2 weeks.

In general the outcome of the Directive would need to be that the actual delivery lead times for infrastructure would support delivery within timeframes for standard delivery to retail end-users.

2. Article 5a.3 item f

The underlying assumption to this paragraph should be that it is the requestor that determines its needs and if infrastructure is available and useable this cannot be replaced by the access provider offering an(y) alternative.

Hoogachtend,



Ellen Koopmans
Manager Regulatory Affairs
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