Benefits and regulatory challenges of VDSL Vectoring (and VULA)

Thomas Plückebaum, Stephan Jay, Karl-Heinz Neumann
Benefits and regulatory challenges of VDSL Vectoring (and VULA)

Thomas Plückebaum, Stephan Jay, Karl-Heinz Neumann
ISSN 1028-3625
Robert Schuman Centre for Advanced Studies

The Robert Schuman Centre for Advanced Studies (RSCAS), created in 1992 and directed by Brigid Laffan since September 2013, aims to develop interdisciplinary and comparative research and to promote work on the major issues facing the process of integration and European society.

The Centre is home to a large post-doctoral programme and hosts major research programmes and projects, and a range of working groups and ad hoc initiatives. The research agenda is organised around a set of core themes and is continuously evolving, reflecting the changing agenda of European integration and the expanding membership of the European Union.

Details of the research of the Centre can be found on: http://www.eui.eu/RSCAS/Research/

Research publications take the form of Working Papers, Policy Papers, Distinguished Lectures and books. Most of these are also available on the RSCAS website: http://www.eui.eu/RSCAS/Publications/

The EUI and the RSCAS are not responsible for the opinion expressed by the author(s).

Florence School of Regulation

The Florence School of Regulation (FSR) is a partnership between the Robert Schuman Centre for Advanced Studies (RSCAS) at the European University Institute (EUI), the Council of the European Energy Regulators (CEER) and the Independent Regulators Group (IRG). Moreover, as part of the EUI, the FSR works closely with the European Commission.

The objectives of the FSR are to promote informed discussions on key policy issues, through workshops and seminars, to provide state-of-the-art training for practitioners (from European Commission, National Regulators and private companies), to produce analytical and empirical researches about regulated sectors, to network, and to exchange documents and ideas.

At present, its scope is focused on the regulation of Energy (electricity and gas markets), of Communications & Media, and of Transport.

This series of working papers aims at disseminating the work of scholars and practitioners on current regulatory issues.

For further information
Florence School of Regulation
Robert Schuman Centre for Advanced Studies
European University Institute
Via Boccaccio, 151
I-50133 Firenze
Tel.: +39 055 4685 751
Fax: +39 055 4685 755
E-mail: fsr@eui.eu
http://www.eui.eu/RSCAS/ProfessionalDevelopment/FSR/
Abstract

VDSL Vectoring is a transmission technology over copper access line pairs enabling the transmission of higher bandwidth to the end customers, but harms the infrastructure based competition using physical unbundled copper lines. Thus regulators have to decide between infrastructure based competition of physical unbundling against earlier broadband rollout meeting the DAE goals in time and bandwidth, while pure fibre based broadband networks will require more time and investment for serving whole areas, but then provide higher bandwidth. Thus VDSL Vectoring is an interim solution. This paper highlights the benefits of such solution and the regulatory challenges and options being faced. The Virtual Unbundled Local Access (VULA) is one regulatory tool forming a compromise between the advantages of physical unbundling and the need to early satisfy higher bandwidth supply targets.

Keywords
Access regulation, market 4, Vectoring, VULA
Introduction

VDSL Vectoring is a technology that improves transmission over copper lines. It is typically installed in a Fibre To The Curb (FTTC) environment. Vectoring allows to better meeting the EU’s Digital Agenda bandwidth goals of 30 Mbit/s downstream for all end customers and also speeding up roll out and decreasing the required investment significantly compared to pure FTTB/FTTH deployment. FTTB/H on the other hand promises more future-proof bandwidth scalability and operational advantages but requires considerably higher investments. VDSL Vectoring is therefore an interim solution for speeding up broadband coverage and enabling traditional fixed line operators to compete with cable-TV infrastructures before FTTH is rolled out. This paper discusses improvements achievable by VDSL Vectoring over standard VDSL technology and compares the required investment with a nationwide FTTH deployment. In addition this paper addresses some regulatory challenges in the European regulatory environment, including the European Commission’s draft regulation on Single Market/Connected Continent [EC 2013].

Vectoring advantages in transmission behavior

Vectering is a procedure that eliminates crosstalk disturbances and resulting signal degradation that are caused by neighboring copper pairs within the same copper pair bundle of a cable (Figure 1).

Figure 1: Copper cable with four cable binders of copper pairs

![Copper Cable](Source: Alcatel Lucent [ALU 2011])

This procedure requires knowledge of all signals transmitted in each copper pair bundle, thus enabling to estimate the crosstalk interference each copper pair injects into the other pairs. Then these effects can be subtracted from the original signal and the signal quality is strongly improved. As a result data may be transmitted over copper pairs with higher bandwidth or over longer distances. This improvement increases the coverage area and thus the connectable end customers in a nonlinear manner (by the square of improvement of distance (Figure 2).
Figure 2: VDSL Vectoring increases bandwidth, distance and coverage

Without vectoring the achievable bandwidth varies noticeably between the different copper pairs of a bundle when all pairs are active (grey pillars in Figure 3). With all lines in operation the achievable bandwidth is also much lower compared to the bandwidth when operating just the single copper pair without any active signals and hence crosstalk from other lines (orange pillars). VDSL Vectoring improves the transmittable bandwidth per copper pair significantly (green pillars), close to the optimum (orange), as demonstrated in Figure 3 as a result of field trials over a distance of approximately 500 m.

Figure 3: VDSL Vectoring increases bandwidth of all copper pairs towards a comparable high level

Source: ECI [Can 2012]

Source: Alcatel Lucent [ALU 2011]
Under vectoring customers also receive roughly equal performance on their copper line. Given that the negative effects of crosstalk increase with the number of active lines vectoring brings the benefit of enabling fully loaded (100%) cable bundles with high bandwidth customers. Without vectoring fully loaded cable bundles suffer from very high signal degradation that effectively cap the penetration at a level below 100%.

Furthermore, the minimum bandwidth in an access cable (red broken line) can be more than doubled by vectoring and this relation is even better in the upstream direction.

In summary, compared to a standard FTTC VDSL solution VDSL Vectoring

- Increases (doubles) bandwidth and decreases asymmetry between up- and downstream,
- Allows to use access cables by 100% high bandwidth customers,
- Enables comparable bandwidth for all customers of comparable distance from street cabinet and increases the minimum bandwidth in the network significantly, improves the predictability of achievable bandwidth and
- Increases the reach per access line, e.g. for 50 Mbit/s, resulting in over proportional increase of end customer coverage ($\pi r^2$).

For further details see [Plu 2013a].

**Investment and financial advantages of vectoring**

FTTC replaces the feeder copper cable between the MDF (Main Distribution Frame or local exchange) location and the street cabinet with fibre and aggregates the end customer traffic in DSLAMs at the street cabinets. By reducing the copper cable distance to the remaining copper subloops from the street cabinet to the end customer homes the transmittable bandwidth is increased. The copper subloops are therefore reused in an FTTC environment. Compared to an FTTH topology there is a significant reduction of investment because no civil works are required in the distribution segment. FTTC requires active street cabinets which have to be expanded compared to standard passive cabinets in order to host the DSLAMs. Due to the decentralization of the DSLAMs compared to hosting them in the MDF locations the scale effects decrease. In total: Assuming the same average revenues per user in an FTTC and an FTTH NGA architecture the profitability of a business case with FTTC is greater.
Table 1: Comparison of the investment per home connected at 70% penetration in Germany

<table>
<thead>
<tr>
<th>Cluster</th>
<th>FTTH/P2P</th>
<th>FTTC</th>
<th>Vectoring</th>
<th>Delta in %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1,440 €</td>
<td>320 €</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>1,650 €</td>
<td>350 €</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>1,740 €</td>
<td>370 €</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>1,780 €</td>
<td>370 €</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>1,840 €</td>
<td>370 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>1,940 €</td>
<td>380 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>2,010 €</td>
<td>410 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>2,180 €</td>
<td>420 €</td>
<td>81%</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>2,230 €</td>
<td>440 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>2,410 €</td>
<td>480 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>2,440 €</td>
<td>500 €</td>
<td>80%</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>2,480 €</td>
<td>520 €</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>2,560 €</td>
<td>560 €</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>2,640 €</td>
<td>600 €</td>
<td>77%</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>2,650 €</td>
<td>590 €</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>2,710 €</td>
<td>640 €</td>
<td>76%</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>2,670 €</td>
<td>680 €</td>
<td>75%</td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>3,030 €</td>
<td>830 €</td>
<td>73%</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>3,410 €</td>
<td>1,020 €</td>
<td>70%</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>4,310 €</td>
<td>1,390 €</td>
<td>68%</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>2,410 €</td>
<td>560 €</td>
<td>77%</td>
<td></td>
</tr>
</tbody>
</table>

Source: WIK [Jay 2014]

Table 1 describes the results of a modelling approach for NGA networks in Germany, where MDF areas were grouped and sorted according to their population density in a descending order into 20 clusters of comparable numbers of households (approximately 2.1 million per cluster). The model calculates the investments required for different efficient NGA architectures in a bottom-up LRIC manner, based on exact data of buildings, households and business locations and deploying these networks along the streets to the existing MDF locations (scorched node approach). The investment required for FTTC will be reduced by 70% - 80% compared to FTTH. This table only compares greenfield investment. It has to be kept in mind that FTTC requires renting the copper subloops so cost of subloop unbundling has to be considered in the business case as well.

An advantage of FTTC over FTTH is the time to market. Since no construction is required in the distribution segment between street cabinets and customer premises the deployment time is reduced significantly. This allows the traditional copper based operators to sooner compete with cable-TV network based operators, which use DOSIS 3.0 for their broadband network offerings. (For further details see [Jay 2014].)
Benefits and regulatory challenges of VDSL Vectoring (and VULA)

Vectoring disadvantages

The vectoring processor needs to control all signals transmitted over the copper line bundle. All copper pairs have to be connected to the same vectoring processor that computes the crosstalk corrections in real time. For the time being this requires to switch all lines to the same DSLAM. In the future international standards may be established that allow operating different DSLAMs (of different networks operators) on the same copper pair bundle ("node level vectoring"). However, as of today standardization has not yet started so node level vectoring will probably only be available in the longer term.

In order to use the advantages of VDSL Vectoring to meet the objective of a relatively quick medium speed broadband coverage (meeting the Digital Agenda for Europe - DAE bandwidth goals) of the European population one has to restrict the number of FTTC operators at the same street cabinet to one operator. This effectively requires changing the regulation for subloop unbundling. Depending on national circumstances this restriction may also affect the local loop unbundling at MDF sites if vectoring is applied to directly connected access lines (without intermediate cabinets). Thus using vectoring results in a remonopolization of the physical infrastructure access to the end customers, so vectoring implies making one step downwards on the infrastructure ladder of investment. While FTTB or FTTH Point-to-Multipoint topologies using GPON also may require stepping back to VULA this can be overcome by real future proof FTTH Point-to-Point topologies allowing for physical fibre LLU with marginal additional cost [Jay 2013].

Even with the improvement of bandwidth and distance the typical copper attenuation behavior cannot be overcome completely, as demonstrated in Figure 2. Thus the improvement in bandwidth through vectoring still depends on the subloop lengths, which differ from customer to customer and in its average also from country to country. In order to meet the DAE bandwidth target of 30 Mbit/s downstream the subloop must not be longer than 1,200 m. (Bonding might expand that length, but requires additional copper pairs and is not applicable in a mass market environment.) Thus the attractivity of vectoring may differ from country to country or even from region to region depending on the subloop length.

Vectoring’s bandwidth potential is limited to speeds slightly above 100 Mbit/s even in short subloops, and it cannot support symmetric transmission behavior. In contrast FTTH typically supports symmetry and does not have this length dependent behavior (at least not in the relevant distances of an access network) and supports bandwidth of 1 – 10 Gbit/s on a single wavelength already today. And fibre capacity capabilities are only starting to be unlocked, while the copper medium is almost at physical limits: The upcoming G.Fast copper standard supports 500 Mbit/s symmetrical over 200 m. Therefore, vectoring, if deployed, is an interim technology on a path towards full fibre access networks. Vectoring might bridge the period until fibre is deployed everywhere, satisfying the increasing bandwidth demand of the end customers.

Regulatory challenges of vectoring and Virtual Unbundled Local Access (VULA)

We see four options of regulatory actions a National Regulatory Authority (NRA) can take in order to deal with the vectoring challenge:

1. Incumbent monopoly
2. First mover monopoly
   a. Open for competition
   b. Free competition (winner takes all)
3. Obligations for second mover with regard to future node level vectoring
4. Forbidding vectoring
1. Since the incumbent is the owner of all access network assets one could decide that the incumbent is the only operator allowed to deploy VDSL Vectoring equipment at the street cabinets and may be also at the MDF locations. In this case the obligation for Sub Loop Unbundling (SLU) (respectively Local Loop Unbundling (LLU)) would be withdrawn. Such decisions have been made in Belgium because none of the competitors expressed its will to compete on a subloop level. The major disadvantage of this option is the resulting single monopoly which provides no incentives to really improve the access network and increase bandwidth further on. Even the investment in higher quality FTTB/FTTH access networks may be stopped or delayed. In Belgium this monopoly has therefore been limited to 3 years in order to reevaluate the situation then. In order to allow the competitive operators to access their end customers the incumbent must offer wholesale bitstream access services whose characteristics are as close as possible to those of physical unbundled access. Typically this bitstream, which is handed over to the competitors at or close to the MDF locations is called VULA (Virtual Unbundled Local Access). This VULA may be imposed also where fibre Point-to-Multipoint topologies (GPON) FTTB/FTTH NGA networks are rolled out, which do not allow physically unbundled access to the access lines at the MDF locations either. It must include the higher bandwidths the incumbent is offering its end customers or even higher bandwidths, too.

2. An alternative option is to grant exclusive rights of using the subloop for VDSL to the first investor who installs VDSL Vectoring at the street cabinet. This (local/regional) competition may increase the roll out speed of vectoring infrastructure and thus might speed up meeting the DAE targets. By this way regional or local monopolies for the physical infrastructure may appear. As in the first option a VULA like bitstream must be offered to all other operators enabling them to serve their customers in future. In order to prevent the operators from stranded investment in planning and civil engineering at the level of a “winner takes all” competition, the German regulator introduced a Vectoring List where plans and commitments for the vectoring deployment on a street cabinet level are registered in a first come first serve manner. While the stakeholders still discuss details of the list operation the principle seems successful.

3. The third option is to not regulate the use of the subloop at all. Instead one would rely on market forces and the rationale that a second investor cannot benefit from its additional investment in a VDSL Vectoring DSLAM in a street cabinet, at least not by increasing the bandwidth to the end customers. This would result in local monopolies for individual cabinets. Again, this could be accompanied by obliging a VULA-like bitstream so other operators have access. While both of the previous approaches also generate investment security for the investors, in this third approach the risk remains that one of the competitors, e.g. a market dominant operator, destroys the vectoring benefits of the first mover by also installing a VDSL DSLAM. This situation may be overcome in the future, when (as a minimum) proprietary node level vectoring becomes available, so all DSLAMs of one supplier support it (instead of international standards for supplier interoperability). A regulation could be defined that obliges the second mover to use the same supplier and his node level vectoring technology as the first mover.

4. Forbidding vectoring allows continuing with the physical unbundling approach of copper lines as before. If SLU is taken at all strongly differs from country to country. But then the end customers and operators cannot benefit from the bandwidth increase and the high bandwidth penetration increase vectoring can supply. Thus the next step towards increasing the bandwidth per end customer then would have to be FTTB/H. This result might be appreciated by policy makers by increasing the speed and footprint of fibre roll out, but also may not be chosen by policy makers in order to increase the bandwidth by a relative lower level for more or nearly all end customers. Correlated with the targets of the Digital Agenda of Europe (DAE) we observe a high political and public pressure towards a smaller bandwidth increase for a much larger number of end customers. A theoretical variant of this approach forbids the use of vectoring only in those dense populated areas where conditions for fibre based infrastructure roll out are good and may also allow for infrastructure replication. Defining these areas would be an additional regulatory challenge.
A recent study on behalf of BREKO, a German association of fixed broadband network operators, estimated the extent of change in broadband coverage depending on the regulatory decisions, either promoting broadband investment by only some major incumbent operators or enforcing competitive investment by many operators, also guaranteeing investment security [Neu 2013]. While Telekom Germany invests into VDSL vectoring in the denser populated clusters 1 – 12 and thus covering 65% households passed, on one hand because of the already existing FTTC VDSL infrastructure and on the other hand because to compete with the cable-TV operators, the alternative operators to the largest extent invest in those areas where so far no competition exists, into the clusters 13 – 19 (see Table 1). Thus regulation may induce or reduce the additional broadband coverage of citizens in a country. The study extrapolates three scenarios (Table 2) and their related investment for the years 2014 – 2018 out of the past investment history.

Table 2: Investment in FTTC VDSL Vectoring by alternative operators depending on regulatory framework

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Investment budget for FTTC/Vectoring</th>
<th>Achievable coverage in Clusters 13-19</th>
<th>Homes passed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenario I</td>
<td>3.25 Bio. €</td>
<td>46%</td>
<td>7 Mio.</td>
</tr>
<tr>
<td>Scenario II</td>
<td>1.02 Bio. €</td>
<td>14%</td>
<td>2.2 Mio.</td>
</tr>
<tr>
<td>Scenario III</td>
<td>5.21 Bio. €</td>
<td>73%</td>
<td>11.2 Mio.</td>
</tr>
</tbody>
</table>

Source: WIK, based on [Neu 2013]

Applying these investments in the WIK NGA cost model results in the number of end customers which can be covered (homes passed) at a penetration rate (homes connected) of 40% by the alternative operators. The results (Table 3) clearly demonstrate the high impact a regulatory framework may have on a countrywide coverage and on achieving EU and national broadband coverage goals.

Table 3: Investment change and impact on coverage depending on regulatory framework

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Investment budget for FTTC/Vectoring</th>
<th>Achievable coverage in Clusters 13-19</th>
<th>Homes passed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenario I</td>
<td>3.25 Bio. €</td>
<td>46%</td>
<td>7 Mio.</td>
</tr>
<tr>
<td>Scenario II</td>
<td>1.02 Bio. €</td>
<td>14%</td>
<td>2.2 Mio.</td>
</tr>
<tr>
<td>Scenario III</td>
<td>5.21 Bio. €</td>
<td>73%</td>
<td>11.2 Mio.</td>
</tr>
</tbody>
</table>

- Area-wide FTTC/Vectoring coverage in clusters 13 to 19 requires 7.1 Bio. € investment
- 15.3 Mio. potential customers (homes passed)
- Δ of scenarios describe potential impact of regulation

Source: WIK, based on [Neu 2013]
The NRA has to balance the increase in broadband coverage against the advantages of free competition based on physical infrastructure. One element of this decision also is to what extent already existing services provided on the copper LLU may be affected: In Austria all DSL transmission signals have to be removed from the subloops/local loops, whereas in Germany only all transmission signals using frequencies above 2.2 MHz are affected, which in fact only are VDSL transmissions. This is due to the fact that relevant crosstalk only has to be considered in the same frequency ranges. Thus ADSL 2+ and VDSL Vectoring can coexist if VDSL Vectoring usage is limited to the frequency bands above 2.2MHz, or physically more exact: ADSL 2+ does not affect VDSL Vectoring if VDSL Vectoring only relies on the frequencies above 2.2 MHz, which results in a minor capacity downgrade for VDSL Vectoring. Since the lower frequencies may be relevant for longer subloops this restriction may depend on local circumstances.

Another at least theoretical regulatory challenge may come up if one operator deploys FTTC VDSL Vectoring, while the next is overtaking its competitor by deploying FTTB with VDSL DSLAMs in the basement, thus both operators using the same copper inhouse cables. Of course crosstalk interference in these cases strongly depend on the nature of the inhouse infrastructure (e.g. shielded or unshielded twisted pairs, single starwise cabling vs. many pairs in a common riser cable). If exclusivity is required for the vectoring transmission, who shall get it, the first mover or the operator being on the higher step of the ladder of investment (and who does not have to care about crosstalks). Who has to decide it, the regulator or the building owner as the owner of the inhouse infrastructure? Fortunately the field experiences in Cologne and Munich (Germany) demonstrated no such conflicts so far.

In those cases where already existing services on physically unbundled copper lines are affected, because the right to use the infrastructure will be withdrawn, migration obligations might help the operators to deal with the upcoming economic damages through migration. The obligations the Austrian NRA RTR made may be a guide:

- If migration is enforced at some cabinets within an MDF area, the complete MDF area may be migrated on demand of the competitor in order to prevent the operation of two parallel access infrastructures within one area.
- The cost of the migration is borne by the incumbent operator.
- The price of the access product remains unchanged if the access line speed is not upgraded.
- The competitor’s frustrated investment (book value of the no longer usable access equipment) has to be refunded by the incumbent.
- The steps of the migration process have to be mutually agreed upon in lines and dates.
Table 4: Countries with an obligation for the SMP-operator for Virtual Unbundling/ Local Bitstream in FTTC/B/H roll out areas in Europe (sorted by date)

<table>
<thead>
<tr>
<th>Country</th>
<th>NRA</th>
<th>Year</th>
<th>FTTC/B/H obulation in case of Virtual unbundling</th>
<th>FTTC obulation in the case of Local bitstream</th>
<th>Consequences for the physical unbundling obligation</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK</td>
<td>Ofcom</td>
<td>2010</td>
<td>FTTC/B/H</td>
<td>-</td>
<td>Non imposition of (physical) unbundling in case of FTTH-GPON</td>
</tr>
<tr>
<td>AT</td>
<td>RTR</td>
<td>2010</td>
<td>FTTC/B</td>
<td>-</td>
<td>Release of SLU in case of overlapping coverage</td>
</tr>
<tr>
<td>BE</td>
<td>BIPT</td>
<td>2011</td>
<td>-</td>
<td>FTTC</td>
<td>Release of SLU in case of FTTC and VDSL Vectoring</td>
</tr>
<tr>
<td>IT</td>
<td>AGRG</td>
<td>2011</td>
<td>FTTC/B/H</td>
<td>-</td>
<td>Non imposition of (physical) unbundling in case of FTTH-GPON</td>
</tr>
<tr>
<td>SK</td>
<td>TÚSR</td>
<td>2012</td>
<td>FTTH</td>
<td>-</td>
<td>Non imposition of (physical) unbundling in case of FTTH-GPON</td>
</tr>
<tr>
<td>DK</td>
<td>DBA</td>
<td>2012</td>
<td>FTTC/B</td>
<td>-</td>
<td>no</td>
</tr>
<tr>
<td>MA</td>
<td>MCA</td>
<td>2012</td>
<td>FTTC (during migration to FTTC only) FTTH (after ongoing Roll-out)</td>
<td>-</td>
<td>Non imposition of (physical) unbundling in case of FTTH-GPON</td>
</tr>
<tr>
<td>IE</td>
<td>ComReg</td>
<td>2012</td>
<td>-</td>
<td>FTTC/B</td>
<td>Release of SLU in case of FTTC and VDSL Vectoring</td>
</tr>
<tr>
<td>AT</td>
<td>RTR</td>
<td>2013</td>
<td>FTTH/B/C; Copper network with vectoring at MDF</td>
<td>-</td>
<td>Non imposition of (physical) unbundling in case of FTTH-GPON</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Release of SLU in case of FTTC without (s. 2010) and with VDSL Vectoring</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Release of SLU in case of FTTC and VDSL Vectoring at MDF without LLU demand</td>
</tr>
<tr>
<td>DE</td>
<td>BNetzA</td>
<td>2013</td>
<td>FTTC</td>
<td></td>
<td>Release of SLU for frequencies above 2.2 MHz in case of FTTC and VDSL Vectoring</td>
</tr>
</tbody>
</table>

Source: WIK, [Plu 2013b]

Accordingly, there will be cases where operators cannot physically unbundle due to either a) economic reasons, or b) due to network technology (vectoring) or topology (like the Point-to-Multipoint fibre infrastructure often deployed in GPON networks) hindering physical un bundling. If in these cases end customers benefit sooner from higher bandwidth offers a new regulatory challenge came up in the past, which the European Commission (EC) answered in all notified cases by admitting a VULA (bitstream) product with features close to physical un bundling. This wholesale service "should be made available at a location close to the end customer premises, similar to LLU," and "should allow product differentiation and innovation similar to LLU and thus give access seekers a sufficient degree of control including the quality of service, over the local connection to the end-user" [EC 2010].

Table 4 provides an overview of these decisions.

The characteristics of the VULA (bitstream) according to the EC up to today may be summarized as:

- Local
- Service agnostic
- Uncontended product
- Sufficient control of the access connection
- Control of customer premise equipment
Defining a VULA service that meets these requirements is a challenge for the NRAs. A well and detailed defined example may be found in Austria. (For further details see [Plu 2013b].)

The EC proceeds in its new draft proposal on Single Market/ Connected Continent [EC 2013] by defining an European virtual access product offered over NGN at layer 2 (Ethernet), which might replace a national virtual access product. Its hand over points shall be closer to the end customers’ premises than the national or regional level. Further network characteristics are:

- Flexible allocation of VLANs
- Service agnostic connectivity, control of download and upload speed
- Security enabling
- Flexible choice of customer premise equipment (CPE) (as long as technically possible)
- Remote access to the CPE
- Multicast functionality (where demanded)

The description also includes features of the business processes, the ancillary services and IT-systems and details the required network description and may be detailed in more depth in future updates.

The ongoing debate on this proposal shall define if this virtual service may be a substitute of the physical unbundling, where it is not feasible due to economic or technical reasons, or if it is an access product which under any circumstances may replace the physical unbundling and as such is the shift away from the regulatory target of infrastructure based competition and the ladder of investment principles at its highest level.

On one hand the initiative to harmonize access products to the benefits of transnational wholesale access seekers and multinational (virtual) companies (which determine a large share of the European GDP) is welcome. However, the authors remain skeptical if these access products can replace the infrastructure competition Europe experienced up to today. With a decrease in infrastructure competition we expect less broadband penetration growth in the European economy and private households in the medium term.
Literature and sources

[ALU 2011]  Frank van der Putten, Alcatel Lucent, answer to BIPT, 18.02.2011

[Can 2012]  Ariel Caner,
Not dead yet: Copper and its new lease on life, ECI Telecom, telecomengine.com 1.5.2012


Comparing FTTH access networks based on P2P and PMP fibre topologies, Journal on Telecommunications Policy (JTPO), July 2013

VDSL Vectoring reduziert Investitionsvolumen für Breitbandausbau deutlich, NET 1/2 2014 13. February 2014

[Neu 2013]  Neumann, K.-H.
Der dynamische Investitionswettbewerb als Leitbild der künftigen Entwicklung des Telekommunikationsmarktes, Study for BREKO, Bad Honnef, 22. November 2013

[Plu 2013a]  Plückebaum, Th.
VDSL Vectoring, Bonding und Phantoming: Technisches Konzept, marktliche und regulatorische Implikationen, wik Discussion Paper No. 374, Bad Honnef, January 2013

[Plu 2013b]  Plückebaum, Th.
Vectoring und virtuelle Entbündelung in Europa, wik Newsletter No. 93, December 2013
Author contacts:

Thomas Plückebaum, Stephan Jay and Karl-Heinz Neumann

WIK Wissenschaftliches Institut für Infrastruktur
und Kommunikationsdienste GmbH
Rhöndorfer Str. 68
53604 Bad Honnef
Germany
Email: t.plueckebaum@wik.org; s.jay@wik.org; k-h.neumann@wik.org