

# Introduction

This document represents the qualitative questionnaire in relation to the third cycle of market analyses referring to the wholesale broadband markets defined in the Recommendation 2014[[1]](#footnote-1) i.e.

* Market 3:
	+ (a) Wholesale local access provided at a fixed location [hereafter referred to as “Market 3a/2014”].

The document is addressed to two categories i.e. one relating to the category of a network operator offering the referred service on a wholesale basis to other network operators in Luxembourg or the category of a network operator purchasing the referred service on a wholesale basis from other network operators in Luxembourg.

Hence question 4 is only for the category of a network operator purchasing the referred service on a wholesale basis from other network operators in Luxembourg

The ILR kindly invites the notified stakeholder to fill in the related information and to return this document by latest June 16th 2017.

# Identification of the stakeholder

Company name of the stakeholder:

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Contact person [full name]:

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Profile

* Operator selling Unbundling services to other network operators in Luxembourg.
	+ Yes/No
* Operator purchasing Unbundling services from other network operators in Luxembourg.
	+ Yes/No

Date of questionnaire

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# Market definition

According to the Recommendation 2014 and previous recommendations on market analysis, the relevant markets have to be defined via the Substitutability Tests i.e. on the demand and offer side. If a substitutability on either the demand side and/or the offer side is established then the product/service will be included into the relevant market.

Therefore the ILR kindly invites you to provide your position on the following substitutabilities.

## Substitutability between the different unbundling modes

i.e. Local loop unbundling and Sub loop unbundling.

In French: Substituabilité entre les différents modes de dégroupage i.e. boucle local et sous boucle local.

The ILR considers that both modes are substitutable and hence are part of M3a/2014.

Your comment:

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## Substitutability between unbundling services and access to civil infrastructure

In French: Substituabilité entre l’accès dégroupé et l’accès aux infrastructures de génie civil (gaines, …).

The ILR considers that both modes are not substitutable and hence are not part of M3a/2014.

Your comment:

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## Substitutability between unbundling services on copper or fibre optics and unbundling services on coaxial cable infrastructure

In French: Substituabilité entre l’accès dégroupé et l’accès dégroupé sur le câble coaxial.

The ILR considers that both modes are not substitutable and hence are not part of M3a/2014.

Your comment:

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## Substitutability between unbundling services on copper and unbundling services on fibre optics infrastructure

In French: Substituabilité entre le dégroupage de la paire de cuivre et le dégroupage de la fibre optique.

The ILR considers that both modes are substitutable and hence are part of M3a/2014.

Your comment:

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## Substitutability between the different access modes on fibre optics infrastructure

i.e. FTTH PON and FTTH P2P, FTTH PON on splitter level and WDM-PON.

In French: Substituabilité entre les différents modes d’accès à la fibre optique.

The ILR considers that both modes are substitutable and hence are part of M3a/2014.

Your comment:

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## Substitutability between unbundling services and wholesale central access provided at a fixed location for mass-market products

In French: Substituabilité entre l’offre d’accès dégroupé et la fourniture en gros d'accès central en position déterminée pour produits de grande consommation.

The ILR considers that both modes are not substitutable and hence are not part of M3a/2014.

Your comment:

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## Substitutability between residential services and business services

In French: Substituabilité entre l’offre résidentielle et non-résidentielle.

The ILR considers that both modes are substitutable and hence are part of M3a/2014.

Your comment:

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## Substitutability between unbundling services and dark fibre services

In French: Substituabilité entre le dégroupage et la fibre noire.

The ILR considers that both modes are not substitutable and hence are not part of M3a/2014.

Your comment:

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## Substitutability between unbundling services and wireless access

e.g. mobile technologies [xG], WiFi.

In French: Substituabilité entre dégroupage et accès sans fil.

The ILR considers that both modes are not substitutable and hence are not part of M3a/2014.

Your comment:

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# Usage of the services

The ILR kindly invites you to provide further information on your rationale for ***purchasing*** the analysed services [i.e. unbundling].

## Why do you purchase the services?

E.g. for which outputs, resale of other wholesale services, use in other end-user services/products.

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# Market entry

The ILR kindly invites you to provide your view on the current market entry.

Please provide a rationale and/or motivation for each issue.

## Infrastructure difficult to replicate

In French : *infrastructure difficilement dupliquable.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Access to financial resources

In French : *accès ressources financières.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Sunk costs

In French : *dépenses à fond perdus.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Economies of scale

In French : *économie d'échelle.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Economies of range

In French : *économie de gamme.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Vertical integration

In French : *intégration verticale.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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## Counter-buyer

In French : *contre-pouvoir acheteur.*

On a scale from 0 [non existing] to 5 [strong impact] :

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Your motivation:

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# Market landscape

The ILR kindly invites you to provide your view on the current market landscape.

Please provide a rationale and/or motivation for each issue.

## How do you consider the actual level of competition?

On a scale from 0 [non existing] to 5 [intense] :

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Your motivation:

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## On which level do you actually compete?

e.g. product differentiation, service differentiation, price level.

Your motivation:

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## How do you rate the actual size of the market?

On a scale from 0 [non existing] to 5 [satisfactory] :

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Your motivation:

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## How do you rate the actual volume of the market?

On a scale from 0 [non existing] to 5 [satisfactory]:

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Your motivation:

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# Prospective view

The ILR kindly invites you to provide your view on the current evolution of the market.

Please provide a rationale and/or motivation for each issue.

## Which technological changes do you foresee?

Your motivation:

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## Which changes do you foresee on the end user side?

Your motivation:

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## Which changes do you foresee on the price/tariff side?

Your motivation:

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## Which changes do you foresee on the product/service side?

Your motivation:

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# Final comments

The ILR kindly invites you to provide your view on any other aspect of the market.

e.g. which other products/service do you foresee in this wholesale market which are not covered supra? How is your investment strategy affected by the evolution on the analysed market? Would you consider co-investing with other providers/suppliers in order to have a faster or more focused network/service roll-out? How is the broadband retail market affected by or affecting the wholesale market under review?

Please provide a rationale and/or motivation for each issue.

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1. COMMISSION RECOMMENDATION of 9 October 2014 on relevant product and service markets within the electronic communications sector susceptible to ex ante regulation in accordance with Directive 2002/21/EC of the European Parliament and of the Council on a common regulatory framework for electronic communications networks and services (Text with EEA relevance) (2014/710/EU) [↑](#footnote-ref-1)