

2021



Investor Perceptions and the Broadband Sector

A survey by the European Bank for Reconstruction and Development

Central Asia Regional

(Kyrgyz Republic, Mongolia & Tajikistan)

Survey context and disclaimer

The EBRD has conducted this survey to contribute to dialogue aimed at advancing development of the sector, its regulation and governance, in particular to promote investments in broadband infrastructure by improving investment conditions.

The views expressed in this report are from the survey respondents themselves and as such are not necessarily the views of EBRD or its representatives. The summaries and recommendations in the report have also been based on conversations with respondents and analysis of the collected views.

The views of respondents were given in confidence and accordingly, in the report, specific statements are not attributed to individuals or organisations.

The respondents' views were expressed here to stimulate and inform debate with policy makers and other organisations that influence broadband markets for investment in each country.

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O: EXECUTIVE SUMMARY

This report examines conditions for investment in broadband infrastructure in Kyrgyz Republic, Mongolia and Tajikistan, selected markets from the Central Asian (“CA”) markets that EBRD operates in. Previous surveys have been recently published¹ on five countries of the Southern and Eastern Mediterranean (“SEMED”), seven in South-eastern Europe (“SEE”) and four in Eastern Europe and the Caucasus (“EEC”).

To prepare these reports, a survey team has held a large number of face-to-face meetings with stakeholders having a direct interest in the Information and Communications Technology (ICT) sector, including policy makers from governments, regulators of the sector, the networks and services operators, sector representative bodies and consultants. For the CA region, meetings were conducted during the second half of 2021.

In addition, and to back-up the face-to-face meetings, a questionnaire was sent to additional stakeholders in the markets surveyed. This report summarises the views expressed in both the face-to-face discussions and from the completed surveys. Throughout the survey, to allow for a frank and forthright discussion, respondents were asked to express their views in strictest confidence. Their comments have been included in this survey report without attributing them to an individual or an organisation, therefore maintaining this confidentiality.

Investments in broadband infrastructure take the form of networks to support fixed and mobile broadband services, together with the necessary civil engineering structures and associated equipment. Around 70% of the survey respondents have investments in fixed or mobile physical network infrastructures and 75% have customer service centres and over 80% have their own investments in physical network infrastructures for the delivery of broadband services. None of the respondents surveyed had investments in TV or satellite networks.

The overall measurement of broadband investment risks and rewards has taken place in the context of growing markets throughout the region. The average growth rate for broadband services, based on forecasts by Fitch Solutions², is 7.9% per annum compound up until 2025.

The regional surveys have attempted to make a comparison between the investment conditions in the individual markets covered. The main components of the respondents’ perceptions are:

- Their views on pure market factors – the market size, growth and investment potential
- Their views of the investment risks – the barriers that limit or delay investments

For the second aspect, investment risk, we have identified 14 factors that contribute most to broadband investment risks, as follows:

- The country's overall legal system, predictability and process
- The legal and regulatory framework specific to electronic communications and broadband investments
- State participation in the sector, for example through ownership of one or more players in the market
- State assistance and funding schemes
- Quality of databases and access to information
- Availability of labour especially with digital skills
- Labour regulations, employment agreements, militancy, disruptions
- Access to state-controlled resources related to investment in networks and services, notably spectrum
- Certainty in obtaining construction permits or wayleaves
- Taxation generally or targeted at the sector
- Overall infrastructure
- Trade barriers

¹ <https://www.ebrd.com/cs/Satellite?c=Content&pagename=EBRD%2FContent%2FContentLayout&cid=1395292756036>

² <https://store.fitchsolutions.com/telecommunications>

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- Political stability, security, criminality, terrorism
- Corruption generally or in any aspect of operations

These factors have been identified from previous surveys conducted by EBRD³. Respondents in the current survey were asked also to add any concerns regarding broadband investments that are not covered by the above list. We have found that these 14 factors listed cover the majority of risks present in broadband investment markets. Where any other concerns were made known, they were relatively minor and have been recorded in the results of this survey given later in this report.

For each of the market and risk factors, respondents were asked to state how the situation in the country affected their investment decision-making. Their responses were categorised into one of the following answers for each factor considered:

- Positively encourages investment
- Does not deter investment
- Mildly deters investment
- Strongly deters investment
- No opinion.

During the 2020/21 surveys, respondents were also asked to indicate, when they are making investment decisions, what was the relative emphasis they place on the *pure market factors* on the one hand and the *investment risk factors* on the other. The resulting balance was:

Relative weights in broadband investment decisions

Pure market factors: 63%

Investment risk factors: 37%

Finally, respondents were asked how confident they were about the country adopting best practices across the sector, in policy and law, in regulation and in implementation. By combining the results obtained from these opinions on market attractiveness, investment risk and best practice potential, we were able to estimate the overall perception of each market by respondents.

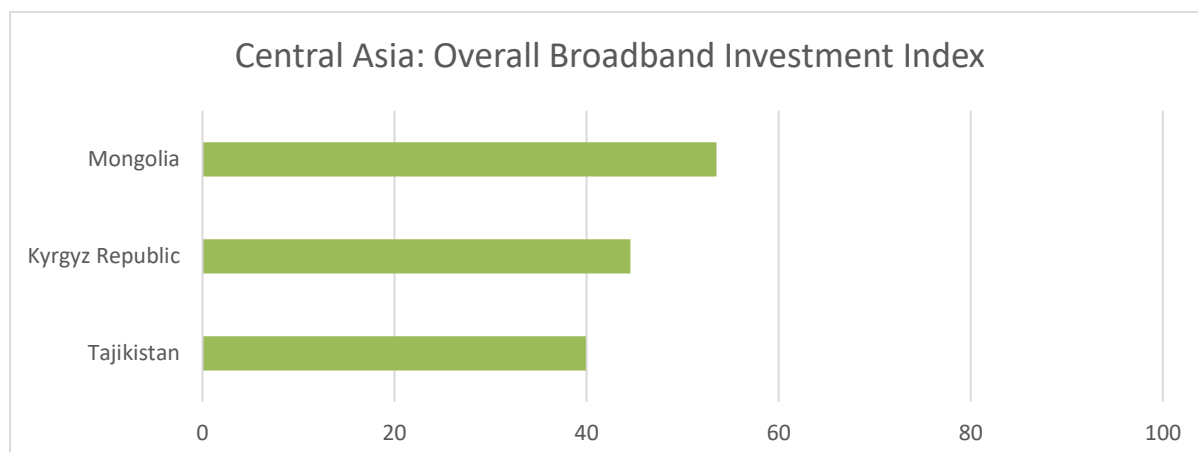
Important note about country-by-country comparisons

It is important to stress that when comparing countries together, that the results for each country reflect largely what respondents in that country say about only their own country. That is to say, for example, we are comparing what investors in Mongolia say about the Mongolian market with what investors in Tajikistan investors say about the Tajik market and so on.

In this respect the resulting ranking between countries should not be taken as strict investment benchmarks. Instead, the differences that are most valid are the level of importance attached to specific risks within each country. The same 14 risk factors have been analysed in each market, but the level of importance for some risks is far greater in some countries than in others.

The results therefore show the relative importance of each risk faced in each country when taking investment decisions. The primary purpose of this comparative analysis is to prioritise the issues for action to improve investment conditions in each country.

³ The EBRD carried out surveys of the ICT sector in 2008, 2012 and 2016, results are available on request.



On the comparative scale, zero would indicate a perception that the investment climate is very poor. A score of 100 would indicate a perception that the overall conditions are perfect for investment. The method of calculation of the index is given in section 2 of this report.

Mongolia, although a small market in population terms, came out with the best measure, taking into account its market potential and the investment risks involved. The Kyrgyz Republic has greater risks mainly associated with political instability and the uncertainties in obtaining the required permits for building broadband infrastructures. Tajikistan is the largest market and still has good growth potential but has some significant investment risks associated with the difficult operating environment with lack of basic infrastructure and difficulties in the supply of equipment particularly during the COVID-19 crisis.

Respondents in all three countries reported their concerns about the current lack of clarity in government policy for digitalisation and the absence of a clear national strategy for universal broadband connectivity. An important feature of the three Central Asian markets surveyed is the continuing presence of state-owned networks. The relationship between the private sector and the state sector varies between the countries but respondents remain concerned that the supporting legal and regulatory frameworks for the sector do not yet contain many of the best practice competitive market safeguards and supporting measures for broadband investments that are present in other markets.

Survey respondents have identified the shortfalls that give rise to distortions in investment decision making, resulting in slower broadband market expansion than in other regions. Broadband infrastructure investments, particularly in rural areas will remain relatively low until many of the main policy, legal, regulatory and procedural weaknesses identified in this survey are resolved.

The investment risk factors of each country's market, as expressed by the respondents to the survey, are explored in more detail in this report.

Overall outlook

Market growth and technology fulfilment

The overall view of respondents is one of good market potential, especially with continuing consumer demand for high-speed broadband services. Current broadband infrastructure investments in the three Central Asian markets are predominantly in 4G mobile broadband expansions. Currently the number of mobile broadband subscriptions outnumber fixed broadband connections by 16 to 1. This is a far higher ratio than in the other regions surveyed. The delivery of fixed broadband services remains restricted by the relatively low geographical coverage of incumbent fixed networks in Central Asia. New investments in fixed broadband networks, including fibre access, have started, but coverage is still largely limited to urban areas.

Mobile broadband investments using 3G and 4G technologies still predominate in the three Central Asian markets surveyed. Optic fibre technology is gradually replacing microwave transmission in the main network infrastructures, including the backbone links to mobile transmitter base stations. Mobile broadband coverage now reaches at least 90% of the population in all three countries, although take-up of mobile broadband service ranges from 106 per 100 population in Mongolia (where many users have two mobile broadband subscriptions) to only 50 per 100 population in Tajikistan. Some investments are being made in fibre access networks but this is still limited mainly to urban areas. The take-up of fixed broadband services has not yet reached 10 per 100 population in any of the three countries.

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5G⁴ mobile broadband services have not yet been launched in the three Central Asian countries surveyed. Although some early preparations are currently taking place for 5G trials, the survey respondents remain unconvinced of the investment case for the significant new investments required for 5G mobile services.

Decisions regarding additional spectrum allocations and investments for 5G infrastructure development are not yet taking account of the expected significant expansion of the current range of ICT services, for example smart cities, vertical industry sector partnerships, logistics and transport, content, data analytics and the “Internet of Things”⁵. In these ways, 5G and expanded fibre access have the potential for a transformational impact on the development of all sectors of economic and social activity. These expected market opportunities bring increased scope for more cross-sector coordination and new business models, all bringing new revenue sources to the broadband sector.

The survey respondents reported that government decisions and regulatory policies on release dates and spectrum pricing for 5G are still not clear enough in the three Central Asian markets to make confident investment decisions.

National digital transformations

In this survey, respondents expressed the view that the full benefits of the ICT market are currently not being achieved in the Central Asian markets surveyed. In their view, the policies and regulatory frameworks in these markets are lagging behind best practice. The new and extended scope of markets created by 5G and fibre access technologies are likely to impact all sectors of the economy in all markets. The traditional networks and service operators have not yet explored new, more co-operative ventures in partnerships with a larger number of players. The new business models remain unclear, with little coordinated consultation at national level on joint investments.

The EBRD is committed to using the digital transition as an enabler of transition in all of the economies and sectors in which it invests⁶. This includes assisting markets to scale up investments in the roll-out of key broadband infrastructure and services to deliver faster and more reliable connectivity. In addition to its investment support role, EBRD’s digital transition involvement includes policy engagement and technical assistance activities to support governments in accelerating the roll-out of affordable, high-capacity digital infrastructure to underserved areas.

Future discussions on broadband investments will involve many parties outside the current broadband sector players, including manufacturing, transport, utilities, agriculture, logistics, media, education, healthcare, public administration and many more.

Broadband infrastructure cost efficiencies

Respondents also expressed the opinion that there are too many examples of separately owned infrastructures (for example ducting, transmission masts, backbone and access cable networks) where cost-saving joint investments or infrastructure sharing opportunities have not yet been exploited. The main players in the three Central Asian broadband markets do not yet appear to have found the correct investment balance between competitive advantage on the one hand and cost efficiency on the other. With the need for greater network reach, more investment and greater affordability, best-practice cost reduction measures, (notably infrastructure and spectrum sharing) should become a more recognised and normal feature of future broadband infrastructure investments.

Collaboration is key to adopting best practices

Respondents believe that only with a more collaborative approach within the sector, between government, regulator, public and private sector as well as between the network operators and other sectors, can the overall transformative economic and social impact of new 5G and fibre-based technologies be achieved. If

⁴ <https://www.digitaltrends.com/mobile/what-is-5g/>

⁵ <https://ec.europa.eu/digital-single-market/en/news/b-day-boosting-connectivity-investments>

⁶ <https://www.ebrd.com/find?keywords=Digital%20Transition&content-all=true&dates-all=true&search-type=search-all&page=1&order-by-date=false>

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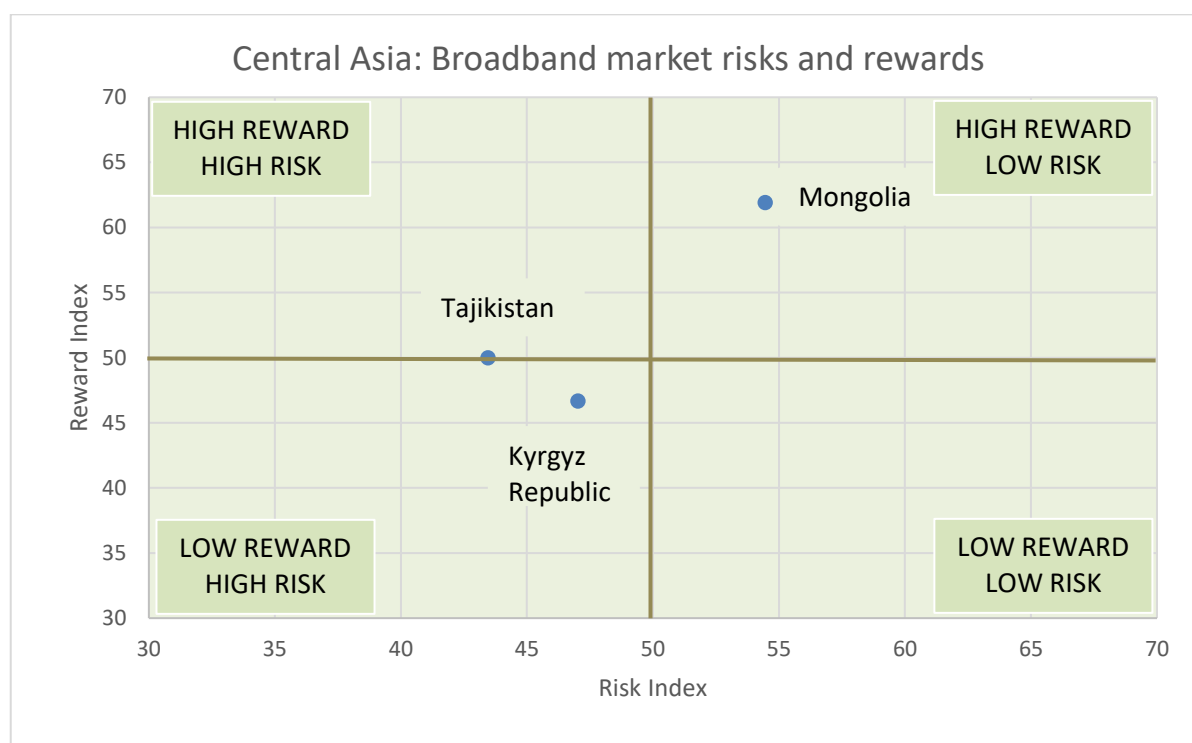
these more collaborative approaches do not materialise, the risks facing investors will continue to be high and the full benefits to the investors, to wider industry and society, will not be realised.

Drawing on these views, the recommendations in this report are designed to inform priority-setting activities by policy makers and sector regulators as they move to adopt many of the best practices already being used elsewhere.

Risks and rewards

Using the results of the survey, we are able to present a picture of the relative risks and rewards associated with broadband investments in each country. In the graph below, the 'Reward Index' is derived from the ratings by respondents of the pure market potential in terms of market size, growth and possible returns. A value of zero represents zero market attraction and 100 represents perfect attraction. The 'Risk Index' is derived from a separate rating by respondents across a number of potential investment risk factors ranging from policy weaknesses, legal, regulatory and procedural bottlenecks, competitive imbalances and limitations on resources. In the case of investment risk presentation, a value of zero represents absolute risk and 100 represents zero risk.

The ideal position on the chart is in the upper right-hand corner where rewards (vertical axis) are highest and risks (horizontal axis) are lowest.



On the Reward Index scale (y-axis) a value of zero represents no market attraction and 100 represents perfect attraction, On the Risk Index scale (x-axis) a value of zero represents absolute risk and 100 represents zero risk.

Based on respondent responses, Mongolia exhibits the highest relative reward, with growth potential and reasonable investment risk. Kyrgyz Republic has some market attraction but a relatively higher risk profile. Tajikistan has less market attraction and even higher risks.

The nature of these market and investment factors is explored in more detail in this report, leading to recommendations to improve the risk/ reward profile in each market, based on views expressed by respondents and their priorities identified in the survey.

Priorities for action

To analyse the factors that respondents used to make this overall assessment, the survey has examined the main risk factors, as expressed by respondents. We have used these views to prioritise the main investment risk factors for each country. For these priority issues, this report defines the key action areas to be addressed if the barriers to investment are to be reduced, making the markets more attractive in investment terms. The key action areas for each country are shown in the table below.

The reasons behind the risks, and the specific recommendations for each country to reduce their risk, are contained in the country-by-country sections of this report and further developed in Section 4.

Central Asian markets: Priorities for action

Investment risk factors	Kyrgyz Republic	Mongolia	Tajikistan
Legal and regulatory framework for broadband	⚠	⚠	⚠
Certainty in construction permits or wayleaves.	⚠	⚠	⚠
State participation in the sector	⚠	⚠	⚠
State assistance and funding schemes	⚠	⚠	⚠
Availability of labour especially with digital skills	⚠	⚠	⚠
Trade barriers	⚠	⚠	⚠
Taxation generally or targeted at the sector.	⚠	⚠	⚠
Overall infrastructure	⚠	⚠	⚠
Political stability	⚠	⚠	⚠
Access to spectrum resources	⚠	⚠	⚠
The country's overall legal system and process	⚠	⚠	⚠
Corruption generally or applied to the sector	⚠	⚠	⚠
Labour regulations	⚠	⚠	⚠
Quality of databases and access to information	⚠	⚠	⚠

⚠ - Low priority/ ⚠ - Medium priority/ ⚠ - High priority

The general recommendations resulting from this survey

Taking the respondents' own views, the survey offers a number of general recommendations for increasing the attractiveness and decreasing investment risks in the four markets surveyed. The recommendations are relevant to all the markets, but their relative priority for action is governed by the table above.

More detailed and specific recommendations are given in section 4 of this report. In summary, and taken together, these recommendations seek to create better conditions for broadband infrastructure investments:

- Governments should create an environment that maximises private investment. Experience from other markets clearly shows that private participation in broadband infrastructure programmes makes any public funds used go significantly further. Private involvement also helps to create programmes that are commercially sustainable in the long term, as opposed to ones that continually rely on state aid and other subsidy programmes.
- The balance of public and private sector investments currently varies across countries. The recent COVID-19 pandemic and growing cyber challenges require a response from public policymakers at both national and international level, as well as investment by private actors to build more resilience into the system.
- The key role of the state is to establish a clear policy for broadband, within which the investment strategies of market players can have greater confidence. This policy should include the support and stimulation of demand for broadband-based services such as eGovernment and eCommerce.
- A relevant renewed component of state policy is the role that governments can play in intervening in their markets in order to provide additional funding where necessary to achieve universal broadband access. The necessary conditions for additional state funding include where the private sector is not planning to invest in particular geographic areas (within the timescale required by the state policy to achieve universal broadband coverage). It is important to ensure that any such state funding does not have an unwanted distorting effect on the broadband market. State policy in this respect should therefore include relevant “state-aid” rules such as those adopted by the European Union (EU) for broadband markets⁷.
- A key component of any broadband policy should be to ensure that all relevant decisions made by government and regulators are consistent with the need for investment to take place without undue barriers. Key examples of these barriers are high levels of taxation on the sector and high charges for access to government-managed resources, notably spectrum resources.
- Future investment efficiencies could be further promoted by policy and regulatory actions. At present there are significant wasted network expenditures on separate civil structures, most often ducts and transmitter masts. Additional costs are also incurred by investors in the delays and uncertainties they experience in getting construction permits and access to rights of way.
- More cooperative models involving network and infrastructure sharing, joint cost ventures and greater coordination of civil works could be introduced to ensure that broadband infrastructure investments maximise the effectiveness of the market, bringing greater economic and social benefits.
- The survey has highlighted the existing and potential shortages of the necessary digital skills required to increase digital infrastructure investments and to achieve the full benefits of a wider digital transformation. This points to a greater need for joint planning and cooperation between the broadband sector with other sectors that are involved in the digital services markets, including the education sector.

These general recommendations, taken together, have been derived from the views of respondents during this survey. We believe that, if adopted, these recommendations should have a significant positive impact on the future investment climate in the markets surveyed.

⁷ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2013:025:0001:0026:EN:PDF>

Section 4 of this report gives nine specific recommendations arising from this survey, based on the views of respondents and building on the general recommendations above. Included in these recommendations are some examples of best-practice models for reducing investment barriers, risks and delays.

The impact of the COVID-19 pandemic

This analysis for this report took place in the second half of 2021 with a full recognition that the broadband market sector is experiencing the impact of the COVID-19 pandemic. The forecasts used in this analysis of fixed and mobile broadband growth up to 2025, are based on 2020 data and do not fully reflect the possible medium-term impact on broadband growth. If anything, business and consumer demand for faster and more reliable broadband services is likely to be permanently increased by rising on-line commercial activity, plus the changes in working and domestic life arising from the pandemic. Another likely impact is one of increased demand outside the main cities (and less growth within city centres) as more people work a greater part of their time from home and also seek to spend more leisure time away from the main population centres.

Some projects have been interrupted or delayed by supply chain problems, for example increased border controls, interruptions in freight transport and restrictions on moving support staff. This has particularly affected markets that rely heavily on imported network equipment. The potential risk to revenues has led operators to seek to diversify their supply chains.

Some revenue losses have also occurred by broadband operators that have provided free services or more generous data packs for example to allow distance learning and home-schooling during school closures. National and international roaming revenues have also declined as people do less travelling. To a large extent, these revenue losses have been compensated by an increase in the number of broadband subscriptions and increased data use.

Another aspect of national policy that has come into particular focus during the full 2020/21 survey as a result of the COVID-19 pandemic, is that of network security and resilience. Respondents raised this issue as one that requires greater national policy discussion, in order to:

- Define clearly the country's critical network infrastructures.
- Coordinate the actions required for responses to network failures or security breaches.
- Put in place measures to protect critical network functions and services from future adverse incidents.
- Prioritise new broadband connectivity investments in areas of greatest need to society, for example to connect unserved remote rural areas and households with school-age children

From the views of the survey participants and from the experiences of the wider international stakeholders in the broadband market sector, there are some lessons now emerging from the pandemic experience. A collection of views, illustrated by case studies is given in the Annex to this report.

Policy and investment-related recommendations have been reinforced by the pandemic experience

Conducting the survey during the course of the pandemic has served to underline the importance of taking account of investors' views so that the remaining barriers to broadband investment, which vary to some extent from country-to-country, can be addressed by policy makers and sector regulatory bodies in close cooperation.

This report makes both general and detailed recommendations based on the analysis of respondent views given before and during the coronavirus outbreak. These recommendations will still apply in the post-COVID-19 situation and in many instances with their relevance brought more into more focus by the COVID-19 experience. The case for further investment in broadband infrastructure has increased, now with even more focus on more reliable and universal broadband services.

At a policy and regulatory level there will also be greater focus on the collaboration between government investments and private sector investments. This is particularly relevant in areas such as policy consultation, the use of public funds, achieving universal broadband coverage and the need for greater investment efficiencies to achieve cost reductions and greater network resilience.

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In section 4 of this report “Detailed Recommendations” we make the case, based on the views expressed by respondents during the survey, for greater investment efficiencies, notably in the following areas, which are also relevant to short-term COVID-19 mitigation:

- A clear national policy for broadband, based on public and private sector investor consultations, supported by a best-practice legal and regulatory framework (Recommendations 1, and 2).
- Greater broadband investment efficiency and co-operation, including making use of wholesale markets, infrastructure and network sharing plus a range of cost-reduction measures specific to broadband investments, backed up by best-practice regulations (Recommendation 3).
- Faster permission granting procedures for network construction (Recommendation 4).
- The role of the state (Recommendation 5)
- The use of state funding to work alongside private investment, accelerating broadband access and affordability (Recommendation 6).
- The availability of digital skills (Recommendation 7)
- Taxation of the telecommunication sector with regard to a wider strategic view of the required investments in the sector (Recommendation 8).
- Efficient exploitation of spectrum resources, particularly in the planning and management of spectrum releases for 5G (Recommendation 9).

The country-by-country sections of this report make reference to the specific factors that are influencing investor decisions on broadband infrastructure investments in each country. Within the context of the above general recommendations, these country-by-country analyses provide policy makers and regulatory agencies with a set of recommended priorities for action in each country that are now raised in importance by the COVID-19 experience.

1: SURVEY BACKGROUND AND OBJECTIVES

Background

Under the Legal Transition Programme of the European Bank for Reconstruction and Development (the “EBRD” or the “Bank”), the Bank’s Legal Transition Team has focused part of its work on the development of detailed analytical assessments of the state of legal, policy and regulatory transition in a number of commercial and financial sectors of its countries of operation. These assessments benchmark the developments in these sectors in each country against recognised international best practices, providing analysis of the existing legislative framework, comparison of that framework with best practice and the identification of gaps and legal and regulatory reform needs.

The Bank has carried out regular (in 2008, 2012 and 2016) assessments of the telecommunications/ICT sector in its countries of operation⁸. These assessments have focused on the overall potential of the sector for reforms that could improve the broader investment climate in the sector, in particular, to improve the infrastructure for delivering modern broadband services. The previous assessment approach used by EBRD has been to study key characteristics of the market, in terms of output metrics (for example broadband penetration, eGovernment and eCommerce world rankings) alongside a comparison between the legal and regulatory framework and best practice in the sector. The methodology relied on building an accurate picture from the outputs of the sector itself alongside on the policy, legal and regulatory environment for investors, service providers and consumers.

The current 2020/21 survey report takes a different approach, one in which the informed views of investors have the most impact. The approach is based on investors’ immediate concerns in terms of which factors in each country contribute most to decisions on whether to invest or not. The results have therefore identified the countries that have the most attractive markets and policies for encouraging investment, particularly for broadband infrastructure and connectivity. The survey outputs, in the form of a ranking of investment attractiveness and a listing of the key investment risk factors, are intended not only to inform investors, but also to prompt policy makers to consider reforms that would improve investment conditions in their countries.

To help with the development and conduct of the survey, EBRD retained an external consulting advisor⁹. The requirements for the survey and analysis methodology are defined in section 2 of this report, which also contains a description of the survey methodology plus the definitions of the required calculations, indexes and rankings.

Markets included in the survey

The markets included in the 2020/21 survey are:

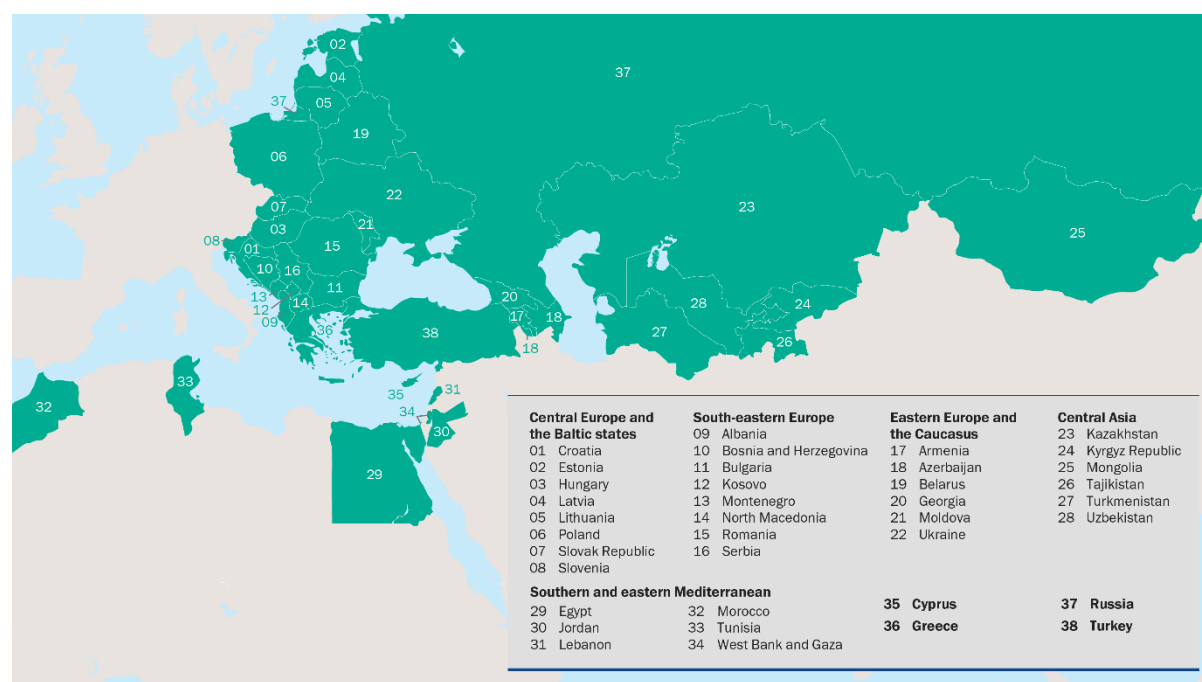
- From the Southern and eastern Mediterranean (SEMED) region: Egypt, Jordan, Lebanon, Morocco and Tunisia
- From the South-eastern European (SEE) region: Albania, Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, North Macedonia and Serbia
- From the Eastern Europe and the Caucasus (EEC) region: Armenia, Georgia, Moldova and Ukraine
- From the Central Asia (CA) region: Kyrgyz Republic, Mongolia and Tajikistan.

This report covers: Kyrgyz Republic, Mongolia and Tajikistan.

⁸ See <http://www.ebrd.com/where-we-are.html>

⁹ Cullen International, an international and independent research organisation specialising in the ICT sector <https://www.cullen-international.com/>

EBRD countries of operation



Objectives of the survey

The overall objective of this survey is to inform investors, policy makers, regulatory and other influencers of investment so that they can make decisions that will increase effectiveness in sector investments and thereby improving broadband infrastructure coverage and capacity.

The survey has involved a wide range of existing and potential stakeholders in investment in broadband infrastructure and service, including finance providers, telecommunications network operators, broadband and internet service providers, analysts and other market stakeholders.

The specific objectives of this survey, analysis and assessment are:

- To produce a comparative “Broadband Investment Index” for each country plus relevant sub-indexes, which will inform policy makers and market participants, based on the perceptions of investors.
- To provide a focus on identifying the key enablers to investment in each country as a means of informing policymakers of specific impediments to sector growth. Such identification should also help EBRD focus its resources on engagement with policy makers and market participants as a means of reducing barriers and increase investment in the sector.

The main output of the survey, analysis and assessment is a ranking of markets, based on their investment attractiveness, with further explanations for each country giving the main reasons expressed by investors that have led to the index and ranking calculated.

The telecommunications/ICT sector and broadband infrastructure investment

The focus of this survey is the broadband infrastructure that enables access to fixed and mobile broadband services. This infrastructure includes electronic communications networks providing access through higher speed broadband services, plus the enabled digital services market, most notably delivered through digital media services and the internet. ICT sector investments will increasingly target new markets and business models linked to greater connectivity. This includes smart cities, vertical industry sector partnerships, logistics, content, data analytics and the “Internet of Things”.

Background and objectives

The policy, legal and regulatory frameworks for the infrastructure market providing access to broadband services have undergone significant changes since the latter part of the 20th century. These changes have been driven by the rapid development of digital technologies and the internet. The traditional telecommunications, internet and broadcast media services markets have been transformed by the influences of these technological developments.

In particular, the model of state-owned monopoly telecommunications and broadcasting infrastructure has been largely replaced by the more liberalised competitive supply of fixed and mobile services. This has responded to more sophisticated consumer demands for better quality services, mobility and the expected higher speeds of access required for a larger range of internet and media services.

The pace at which ICT-based markets have been transformed has varied from country to country. One of the significant determinants of the speed of transition from monopolistic to competitive markets has been the progress made by each country's policy and law makers in adopting the enabling legal and regulatory frameworks. To put in place modern digital network infrastructures with competitive service delivery, the legal and regulatory frameworks have to be seen as enablers, not barriers, to investment.

In addition to the attractiveness of the broadband market, investors (whether existing operators or new market entrants) require an effective legal and regulatory framework to help reduce risks and increase their confidence to invest.

The goal of universal broadband connectivity

Since the wave of privatisations across the sector from the 1980s onwards, the majority of investments in ICT sector infrastructure are now private sector investments. In recent years, a parallel role for public investment has been proposed. This additional state investment seeks to fill the gap caused by the lower private commercial investment returns resulting from a state policy to achieve universal broadband access to all citizens, including the more remote regions.

Policy makers have adopted different types of market interventions, including:

- Market demand stimulation (for example through the implementation of eGovernment services).
- Direct public subsidies that accelerate private investment into the more remote regions, including via public-private partnerships.
- Direct public investments in broadband infrastructure for delivering government services and to provide wholesale capacity for the commercial operators to exploit.

Private investors see these types of public investments as complementary to and supporting of private investments, not as competing networks. Governments should continue to create an environment that maximises private investment at the outset. Private involvement also helps to create programmes that are commercially sustainable in the long term, as opposed to ones that continually rely on state aid and other subsidy programmes.

The global COVID-19 pandemic has raised awareness of the current lack of universal broadband connectivity. This report has a separate section that records the key messages that have been expressed on planning for a post-COVID-19 world. These messages reinforce the need for further broadband investment initiatives, using private investments alongside public intervention where necessary to achieve more connected broadband-enabled societies.

Growth drivers

Broadband market investors have faced new challenges. In the markets surveyed, competitive markets have been introduced, allowing new entrants to provide services, both by direct infrastructure investment and by exploiting the existing broadband connectivity provided by incumbent operators. The new entrants include providers of “over the top” services, starting with voice services over the internet (“VoIP services”). Users can now also benefit from a wide range of “streaming” services using the internet, giving multi-media content including high-definition video.

Background and objectives

These new services have significantly threatened the traditional revenues of the existing network operators, forcing them to find new market offerings, including “bundled” fixed and mobile broadband-enabled packages of voice, internet and video content.

Additional technology developments, particularly in mobile communications, have allowed faster and more reliable broadband connectivity. 3G and 4G mobile services are now reaching almost full population coverage. The growth in the number of users and the higher data download speeds demanded by those users have already attracted significant new investments to keep up with this new demand.

As well as the existing competition between the larger network operators, new forms of competition have developed, attracted by the growth in demand for broadband-enabled services. The continued growth in broadband services has attracted investments across a wide range of infrastructures, including:

- Fixed and mobile networks.
- Cable, terrestrial and satellite TV networks.
- Buildings, towers, physical structures, power plant and other supporting services for ICT infrastructures.
- Data centres and internet exchange points.
- Customer service centres and retail shops.
- Investments and business models linked to connectivity – for example smart cities, vertical industry sector partnerships, logistics, content, data analytics, internet of things (in the light of 5G and its potential).

The survey found respondent interest in all these types of infrastructure, from existing players and new entrants. The larger network operators continue to provide a full range of broadband services, while others emerge as specialist investors, for example tower companies, data centres and internet exchange points, focussing on one investment type.

Smarter investment strategies

Greater competition is resulting in both existing companies and new entrants seeking new ways to make investments more efficient. The lowering of unit costs in the supply in broadband services markets is needed to maintain profit margins. In the EU, policy makers and regulators have promoted specific cost reduction measures for broadband investments^{10,11,12,13}, including:

- The efficient use of wholesale markets in the telecommunications sector.
- The liberalisation and fairer pricing of spectrum.
- Removing sector-specific taxation.
- Greater coordination of civil works and access to multi-occupancy buildings.
- Cost and infrastructure sharing models including joint investments and public-private partnerships.

These newer policy and regulatory measures, although also being adopted by non-EU countries, have not yet had significant impact on investment efficiency outside the EU. All countries are facing the same investment needs, driven mainly by the significant growth in broadband services demand and often alongside national policy directives towards achieving universal high-speed broadband connectivity.

Policy, legal and regulatory frameworks are gradually being adapted to these new demands, in some countries faster than in others. This survey has sought to identify the main remaining obstacles to efficient investments in broadband infrastructure in each country.

¹⁰ https://ec.europa.eu/competition/sectors/telecommunications/overview_en.html

¹¹ <https://ec.europa.eu/digital-single-market/en/cost-reduction-measures>

¹² <https://ec.europa.eu/digital-single-market/en/content/eus-spectrum-policy-framework>

¹³ https://ec.europa.eu/taxation_customs/business/vat/telecommunications-broadcasting-electronic-services-archived_en

Background and objectives

The important next wave of ICT infrastructure investments has already been foreseen in all the markets surveyed. Mobile services will be enhanced by 5G technologies which will include many more applications around the “Internet of Things” and other, not yet fully defined, digitally enabled business and service models. In the fixed broadband market, fibre access investments will grow to meet the faster (and more reliability dependent) data services requirements of businesses and households. Fixed access services will be enhanced by fibre-based local networks that are better suited to the higher capacity and reliability needs of broadband users.

The range of business models required for these new investments are likely to involve more collaborative approaches. Greater cooperation will not just be between the operators and service providers in the ICT sector. New ventures span different market sectors, including telecommunications with healthcare, education, agriculture, logistics, public sector management, transport, entertainment, manufacturing, supply chain and many other industrial sectors.

Smarter investment models designed for this greater collaborative investment world are continuing to emerge. In the view of the respondents, the makers of policy, laws and regulations will need to engage fully with the sector and be seen as better facilitators for these new types of smarter investments.

The way forward

The respondents to this survey appear to have reached a turning point in their approach to future infrastructure investments. Over the past twenty years investors have tended to choose strategies that build separately owned and operated infrastructures for each network operator. There is a general realisation that new investments in ICT infrastructure in the future will require new and more collaborative models to be considered in order to reduce costs and maintain investment returns.

According to survey participants, the sector’s collaboration experience has so far not been good, evidenced by the many examples where each operator invests in separate civil works, separate parallel network capacity and separate transmission masts. Greater cooperation would have saved investment funds that could have been used to expand and improve connectivity. Fierce competitive pressures appear to have prevailed over the economic good sense of cost reduction. Collaboration between operators has not yet become normalised.

The collaboration experience between policy makers and the sector players has also not been good. Governments still expect to receive high fees for spectrum resources, diverting investment funds away from achieving the policy aims of better infrastructure and a more universal access. In some markets, taxation schemes targeting the sector still seek to extract maximum payments from telecommunications and internet providers, further limiting their capacity to make investments in ICT infrastructure. In addition, there are still inconsistent and time-consuming administrative procedures for obtaining network construction permits and access to rights of way.

Structural influences from the next wave of investments

“Digitisation is also fostering cross-industry interaction; telecommunication operators should be the landmarks in enabling other industries along their digitisation journeys.

“New high-speed networks and next-generation quality of services features are increasingly becoming the main drivers for digital growth, but still the business equation is not yet solved to unlock wide roll-out of fibre-to-the-premise and upcoming 5G development.”

“Beyond the evolving roles for established players, a multitude of start-ups are leveraging the Internet of Things (IoT) to create a new business model and domain for business.

“Most successful IoT use cases would not be implemented by single players alone, but with agreed roles together in partner ecosystems. Right ecosystems are a major driver of IoT success”.

[Source: AD Little 2019 Report “(IoT) breakthrough – Is the industry ready for commercial success?”¹⁴]

Recommendations are made in this report, based on our survey of investor perceptions. These recommendations aim to reduce the most important barriers facing investors in broadband infrastructure. Most of the recommendations are based on best practices already in place in other markets, notably in the EU. In some of the markets surveyed, these best practices are already being implemented but implementation has so far been relatively slow. The survey respondents have expressed the view strongly that best practice adoption for the governance of the sector need to be accelerated before their investment decisions on 5G and fibre access can be made more confidently.

The recommendations in this report are therefore designed to inform priority-setting activities by policy makers and ICT sector regulators in readiness for the next wave of ICT infrastructure investments driven by rapidly growing and extending markets for broadband services.

¹⁴ <https://www.adlittle.com/en/who-dares-wins>

2: SURVEY METHODOLOGY

Taking an investor's view

The previous (2008, 2012 and 2016) EBRD assessments studied the legal and regulatory conditions applying to the electronic communications sector in a wide variety of national markets. Investors take into account many factors before they decide whether to invest or not.

For the 2020/21 survey, we have directly recorded the views of a wide range of existing and potential stakeholders in investment in broadband infrastructure and service, including, telecommunications network and service operators, broadband and internet service providers, analysts and other market stakeholders. "Broadband investment" embraces telecommunications infrastructure and connectivity (fixed and mobile networks) and the services (both retail and wholesale) that are delivered over these networks (voice, internet, data, media and broadband services). This definition is used within the context of the key purpose of this survey – to promote broadband infrastructure investments.

In addition, the survey team has researched and held wider discussions regarding the overall policy, legal and regulatory conditions used by the relevant authorities in each country. In this way, we have attempted to match the effectiveness of the relevant conditions in each country to investor needs.

Stakeholders generally use benchmarks to compare the conditions in their country alongside the conditions achieved in neighbouring markets and regions, notably the EU. The EU is generally perceived to be an open and effective marketplace for ICT investments. The EU's current legal and regulatory framework ("The European Electronic Communications Code"¹⁵) is viewed by investors as an enabler to overcome the most commonly faced problems in the competitive ICT markets.

Other factors are used in our surveys that could be useful to investors in deciding on which countries to focus on now and in the future. The most important of these other factors are the relative broadband market sizes and growth potential. Where we have included this information in the report, the source of the data has been given.

Respondents' views of the policy, legal and regulatory enablers for broadband infrastructure investment have led us to identify the gaps in policy implementation. The action areas required for each country are shown in the results Section 3 of this report.

What are the components of the survey?

The main purpose of the survey is to use the results to inform investors, policy makers, regulatory and other influencers of sector investment to increase effectiveness in telecommunications sector investments and in particular to improve broadband infrastructure coverage, capacity and connectivity.

Confidentiality

To allow for candid and forthright responses, the answers provided and views expressed by the respondents to this survey are treated in strictest confidence by the Bank. The overall results, or any part of the results are not attributed to any organisation, group of organisations or individuals. The Bank will publish the main results to benefit investors, policy makers, regulators and other sector players, making it clear where actions need to be taken to improve the climate for sector investments.

This will be done without breaching the confidentiality of the persons and organisations that expressed their opinions during the survey.

¹⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1972&from=EN>

Survey methodology

Respondents were asked to make a separate response for each country where they are familiar. Their knowledge of the country could be either by their existing presence, or by their having studied the market for possible investment in the sector in that country. The markets being analysed include the following: Albania, Armenia, Bosnia and Herzegovina, Croatia, Egypt, North Macedonia, Georgia, Jordan, Kosovo, Kyrgyz Republic, Lebanon, Moldova, Mongolia, Montenegro, Morocco, Serbia, Tunisia and Ukraine. This report covers three markets of the Central Asian region: Kyrgyz Republic, Mongolia and Tajikistan.

The survey sought opinions on the market for broadband investment from several overall viewpoints:

- Market attractiveness - what is perceived about the market size, potential and attractiveness for investments?
- Investment risk factors - including sector policies, the general and specific legal and regulatory frameworks, public and private sector cooperation, availability and quality of input resources including spectrum, labour and rights of way, taxation, trade policies and political stability.
- Best practice potential – what level of confidence do investors have in the country moving towards best practices for the sector?
- The following sections define these various factors and how they are used and reported in the survey.

Market attractiveness and investment risk factors

Respondents were asked to indicate, when they are making investment decisions, what was the relative emphasis they place on the pure market factors on the one hand and the investment risk factors on the other. The results from the markets surveyed gave pure market factors 57% and investment risk factors 43%.

Additionally, a number of factors relevant to investments in the ICT sector are included in the survey. Each factor and its components and weightings is described in the table below.

Survey factor	Components	Weightings
Perception of market attractiveness	Respondents are asked, for the types of investment that they are involved in, - what is their view, for each country, of the overall market potential, regardless of the investment conditions and risks there? Respondents were asked to add comments to support their views.	63%
Investment conditions, risks and related factors	In this part, 14 potential risk factors are listed. Each could influence investment decisions in each country. Respondents were asked to give their view separately for each listed factor and for each country. Respondents were asked to add comments to support their views. These comments could be on any of the listed topics or other areas of the situation, ranging from “examples of best practice” right through to “examples of any key inhibitors and barriers to investments”.	37%
The list of 14 potential risk factors identified for the broadband market		
<ol style="list-style-type: none"> 1. The country's overall legal system, predictability and process This factor covers the overall national legal system and its enforcement, the effectiveness of public authorities, the risk of overlaps, duplications and inconsistencies. 2. Legal and regulatory framework specific to electronic communications and broadband investments This includes the existing overall legal and regulatory framework (primary and secondary legislation/ by-laws) relating specifically to the electronic communications networks and services sector, your confidence in the effective application of those laws and the transparency of the procedures used by-law makers and regulatory bodies in supervising those laws. The types of laws and regulations for the sector are typically related to the rights and obligations of market participants, interconnection and access, sector competition, conditions for the provision of services, technical standards and any specific rules for promoting investments. 3. State participation in the sector This includes the level of state ownership of networks and service operators and the possible implications for competition, for example the possible bias that could result in applying policies, laws and regulations. 		

Survey methodology

<p>4. State assistance and funding schemes This includes any funds that are available to investors for assisting electronic communications networks and services expansion or for ensuring universal service (for example rural development funds, digital society/ information society development funds, broadband infrastructure funding) and the related rules and procedures applying to such funding with relation to the related conditions for state participation, open access, distortion of competition etc.</p> <p>5. Quality of databases and access to information This includes the existence and reliability of relevant information sources for population distribution and other relevant national statistics as well as specific databases for licence-holders in the sector, interconnection offers, network infrastructure atlas, index of relevant laws and regulations.</p> <p>6. Availability of labour especially with digital skills This includes the labour and skills required for network construction and operations, customer service and business management.</p> <p>7. Labour regulations, employment agreements, militancy, disruptions This relates to the national or sector specific conditions for employing labour in support of investment and operations, including the risk of strikes or other disruptions outside the control of the investor, for example through organised labour campaigns generally or directed at the sector specifically.</p> <p>8. Access to state-controlled resources related to investment in networks and services This includes the access to, and the procedures used in frequency spectrum, numbering ranges or any other types of networks or services licences or authorisations required before launching new services or growing existing services.</p> <p>9. Certainty in construction permits or wayleaves This includes any required approvals for physical construction or civil engineering works and the placing of plant on public or private land (including masts, towers, poles, overhead wires, ducts, manholes, operational or other buildings, street furniture etc.).</p> <p>10. Taxation generally or targeted at the sector This includes the general taxation applied to businesses and individuals plus any specific taxes or additional financial burdens placed on trading in the electronic communications sector, the collection of services revenues or on the outlay of investment or operating costs.</p> <p>11. Overall infrastructure This relates to the national and local infrastructures for road transport, electric power distribution, and other utilities essential to the normal operation of electronic communications networks and services.</p> <p>12. Trade barriers This includes any trade barriers or specific trade tariffs (generally or related to the sector), ownership restrictions, profit repatriation, currency risks.</p> <p>13. Political stability, security, criminality, terrorism This relates to any aspect that threatens your overall presence in the country from danger to life and personal safety or the overall climate of adherence to rule-of-law and the general level of criminal threats against businesses, residents and visitors.</p> <p>14. Corruption generally or in any aspect of operations This relates to the likelihood of corruption affecting investments or operations, either through the taking of bribes in return for specific assistance or through systemic corruption applied generally in contravention of relevant laws and regulations.</p> <p>Any other aspects that are not mentioned above A section where the respondent can add any other investment related risk factor not covered above, including a view that one of the above factors is overriding in their decision whether or not to invest.</p>	
<p>For each factor (market attractiveness plus the 14 potential risk factors), a rating is given by choosing one of the following categories:</p> <ul style="list-style-type: none"> • Positively encourages investment • Does not deter investment • Mildly deters investment • Strongly deters investment • No opinion. 	<p>100% Total weighting</p>

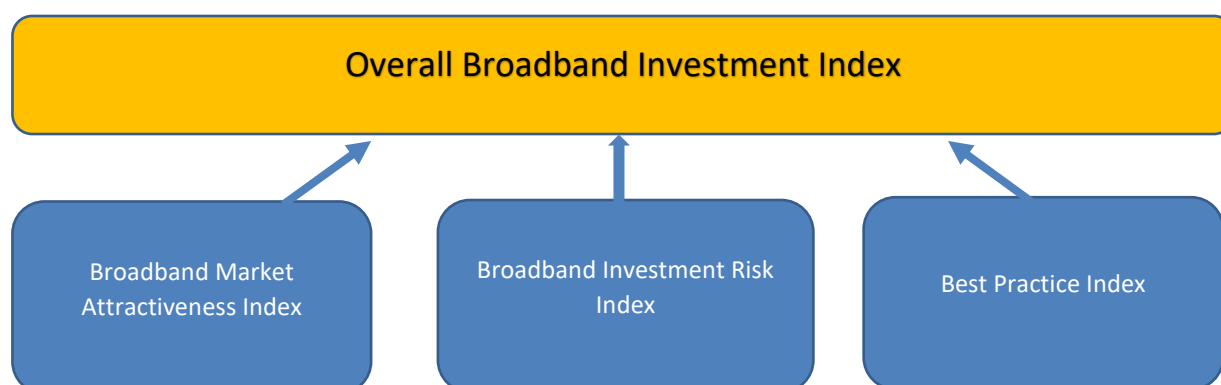
Progress towards the adoption of best practice

An additional part of the survey concerns the levels of confidence that respondents have regarding the country's movement towards the adoption of best practices for the sector.

Survey factor	Components
Confidence in moving towards best practice	Respondents were asked to rate the confidence that they place on the country's policy makers/regulators etc. being motivated and able to improve towards implementing best practice conditions for investors.
<p>The level of confidence is measured by choosing one of the following categories:</p> <ul style="list-style-type: none"> • Very confident • It could happen within reasonable time • Some doubts that it will happen at all • Strong doubts / Unlikely ever to happen • No opinion 	

The methodology for calculating the overall Broadband Investment Risk index

The main index proposed for the overall comparison of markets is the Overall Broadband Investment Index. Its calculation combines the results of three sub-indexes, the Broadband Market Attractiveness Index, the Broadband Investment Risk Index and the Best Practice Index.



The Overall Broadband Investment Index therefore seeks to measure factors associated with the attractiveness of the market, the perceived barriers to investing in that market and the potential for the country to improve the investment climate by removing the barriers.

The resulting Index is normalised so that the maximum possible value is 100 and the minimum value is zero. The ranking of markets according to their Overall Broadband Investment Index will therefore show which markets are perceived more positively or less positively by respondents.

Component Index 1: Calculating the Broadband Market Attractiveness Index for each country

The Broadband Market Attractiveness Index for each country is calculated from the average of responses to a specific question: *“For the types of investment that you are involved in - what is your view, for each country, of the overall market potential, regardless of the investment conditions there?”*

The responses are placed into one of five possible categories:

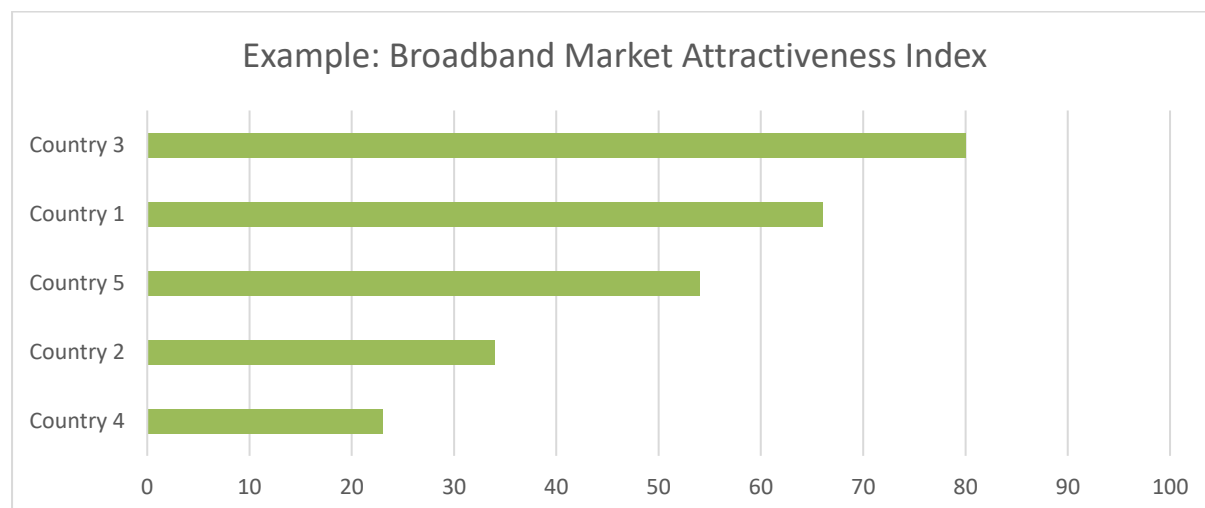
- Positively encourages investment
- Does not deter investment
- Mildly deters investment

Survey methodology

- Strongly deters investment
- No opinion.

The average result for each country is calculated by adding the total scores from all responses for that country and dividing by the number of responses.

The resulting Index is normalised so that the maximum possible value is 100 and the minimum value is zero. The ranking of markets according to their Broadband Market Attractiveness Index will therefore show which markets are perceived by respondents to have the most intrinsically attractive markets and which are less attractive.



On the comparative scale, zero would indicate a perception that the broadband market has no attraction. A score of 100 would indicate a perception that the market potential is perfect.

Component Index 2: Calculating the Broadband Investment Risk Index for each country

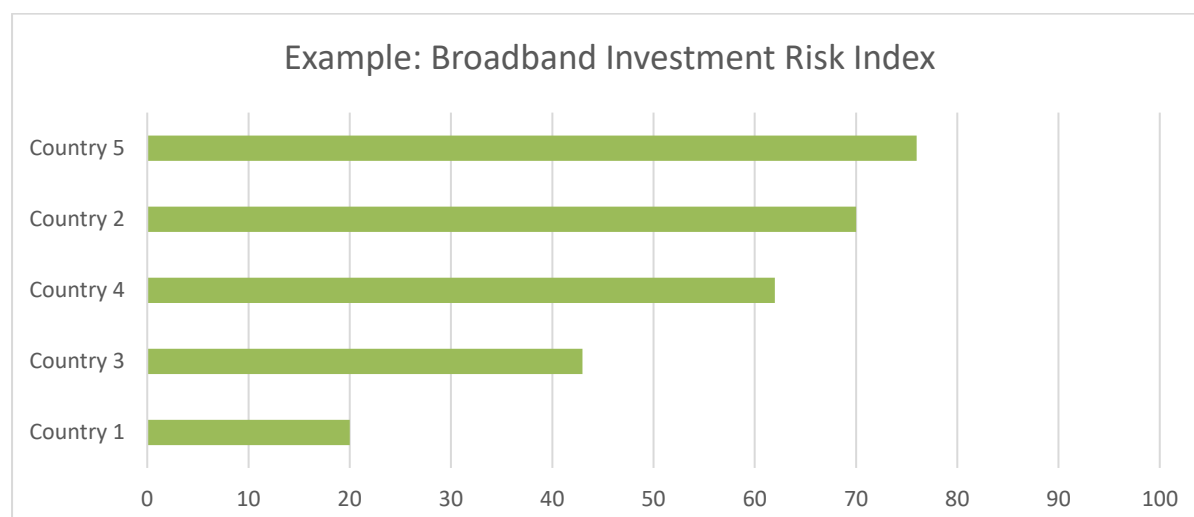
The Broadband Investment Risk Index for each country is calculated from the average of responses to a section of the questionnaire that lists 14 relevant investment risk factors. For each factor in turn, the respondent is asked *“In this part, we go through a list of 14 factors, which could influence investment decisions in each country. Please give your view separately for each listed factor and for each country.”*

The responses are placed, for each of the 14 factors in turn, into one of five possible categories:

- Positively encourages investment
- Does not deter investment
- Mildly deters investment
- Strongly deters investment
- No opinion.

The average result for each country is calculated by adding the total scores from all responses from all 14 questions for that country and dividing by the number of responses to all questions.

The resulting Index is normalised so that the maximum possible value is 100 and the minimum value is zero. The ranking of markets according to their Broadband Investment Risk Index will therefore show which markets are perceived by respondents to be the least intrinsically risky and which markets have most risk.



On the comparative scale, zero would indicate a perception that the broadband market has no enabling policy or has other absolute barriers and risks to investment. A score of 100 would indicate a perception that the full implementation of policies, legal and regulatory frameworks and other enabling conditions are already in place leaving no barriers or risks to investment.

Component Index 3: Calculation of the Best Practice Index for each country

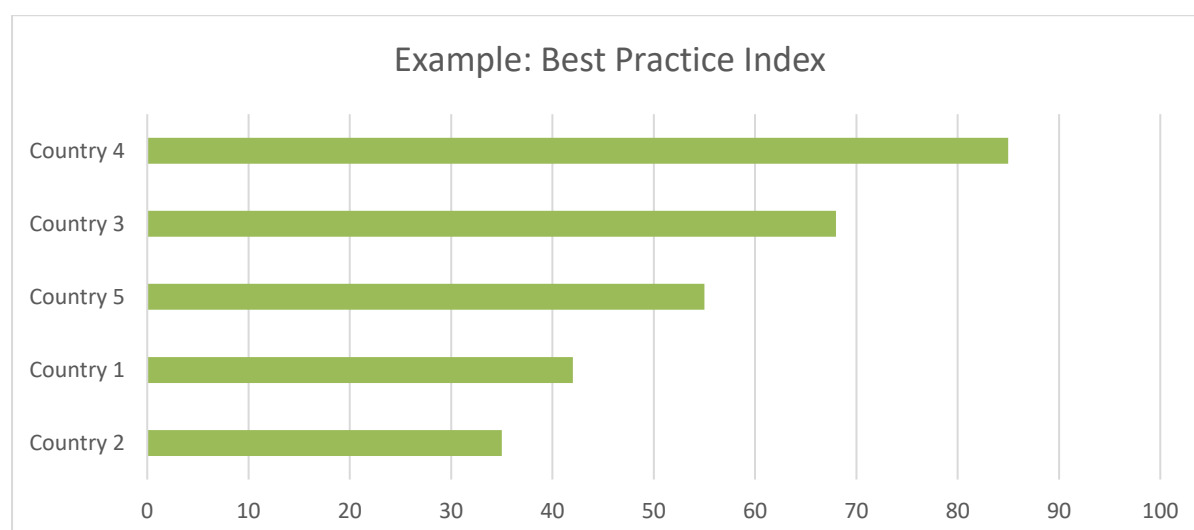
The Best Practice Index is calculated by using the responses to the specific question: *“Please rate the confidence that you place on the country’s policy makers/regulators etc. being motivated and able to improve towards implementing best practice conditions for investors.”*

The responses are placed into one of five possible categories:

- Strong doubts / unlikely ever to happen
- Some doubts that it will happen at all
- It could happen within reasonable time
- Very confident
- No opinion

The average result for each country is calculated by adding the total scores from all responses and dividing by the number of responses to all questions.

The resulting Index is normalised so that the maximum possible value is 100 and the minimum value is zero. The ranking of markets according to their Best Practice Risk Index will therefore show which markets are perceived by respondents to be more likely to move towards better conditions and which are less likely.



A value of zero would indicate that the country has no best practices relating to broadband investment conditions. A score of 100 would indicate that the country has already adopted all relevant best practices.

Calculation of the Overall Broadband Investment Index for each country

The Overall Broadband Investment Index (BII)_c for a country is a composite index that combines the Broadband Market Attractiveness Index (MAI)_c, the Broadband Investment Risk Index (IRI)_c and the Best Practice Index (BPI)_c for the country, according to the formula:

$$(BII)_c = 0.67 \times [W_m \times (MAI)_c + W_r \times (IRI)_c] + 0.33 \times BPI_c$$

Where,

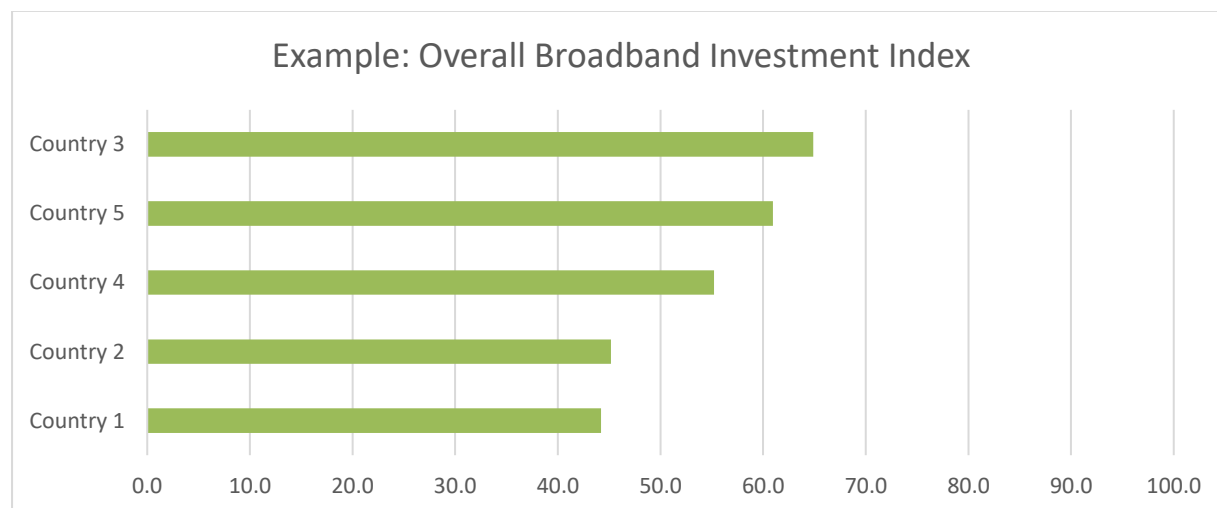
W_m = weighting applied to the Broadband Market Attractiveness Index (MAI)_c for the country

W_r = weighting applied to the Broadband Investment Risk Index (IRI)_c for the country

BPI_c = Best Practice Index for the country

And $W_m + W_r = 1$

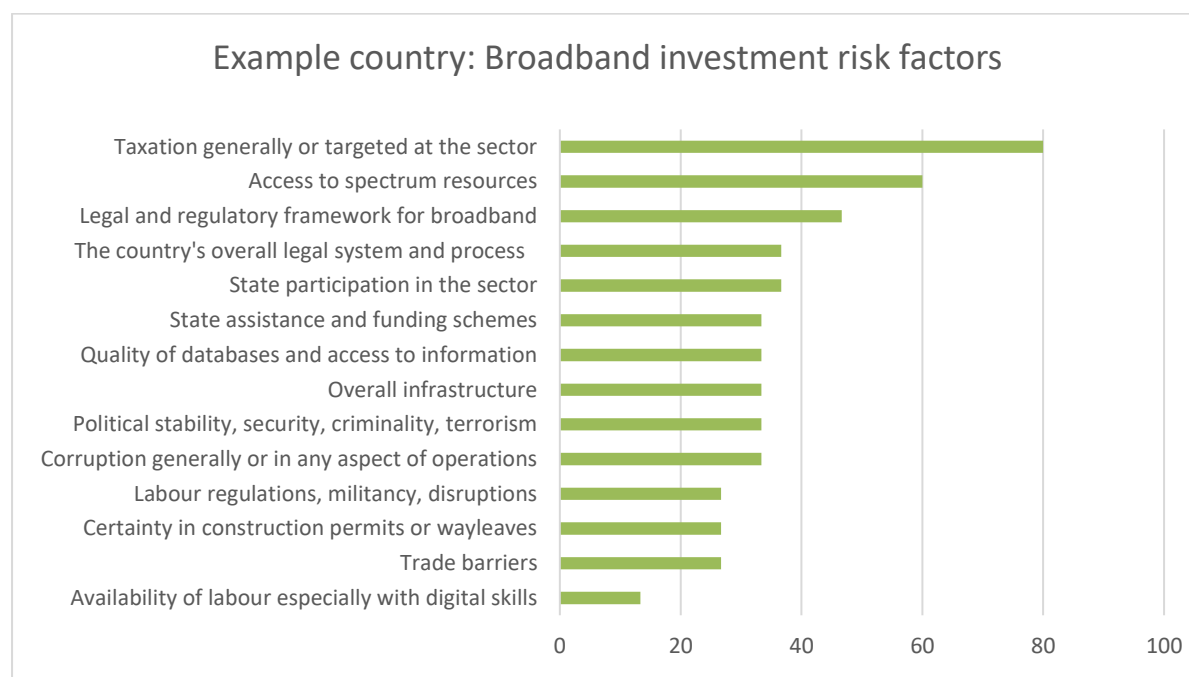
The values of W_m and W_r are derived directly from the aggregated results (average of all respondents for all markets) to a specific question in the survey. Respondents are asked to judge how much relative weight that they place on pure market attractiveness factors on the one hand and investment risk factors on the other hand. W_m has a calculated value (from the full survey responses) of 63% and W_r is 37%.



On the comparative scale, zero would indicate a perception that the investment climate is very poor. A score of 100 would indicate a perception that the overall conditions are perfect for investment.

The above example results show that Country 3 has the best conditions for broadband infrastructure investment, despite there being relatively worse perception of the risks involved for Country 3. Country 5, despite being perceived as less attractive in pure market terms, has the best risk profile and reasonable potential to adopt best practices. Country 4 has the lowest market attractiveness but there is good confidence that it will soon adopt best practices. Countries 1 and 2 are relatively unattractive.

The next step is to reveal the factors that most significantly influence the investment risk in each country and therefore to indicate the key areas of policy that need to be tackled in order to improve investment conditions. This important result is obtained by ranking the responses to the 14 factors that make up the Broadband Investment Risk Index.



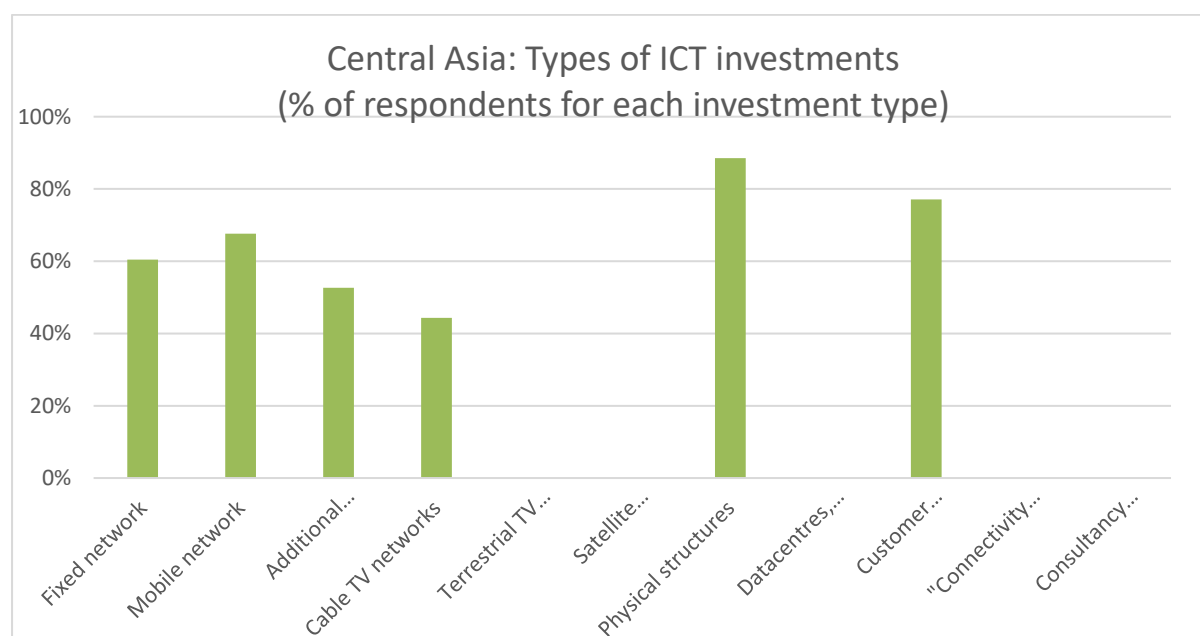
A score of zero for any factor would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

In this example, the three priority factors that most hinder investments are high taxation on the sector, poor spectrum access and limitations in the legal and regulatory framework. The remaining factors, although contributing to the overall investment conditions, are less important in the eyes of the respondents.

3: SURVEY RESULTS

Types of investments

The respondents to the survey covered a range of investment types in the ICT market, from fixed and mobile networks through to customer services centres and consultancy services.



Most respondents are involved in operating either fixed or mobile networks including basic voice, internet, and broadband services. An increasing number of operators are now offering both fixed and mobile broadband services.

The main broadband market investments over the last ten years have been heavily skewed toward mobile rather than fixed network services. On average, the take-up of mobile broadband in the Central Asian markets surveyed outnumber fixed broadband by over 16 to one. This dominance of mobile broadband over fixed broadband in Central Asia is significantly greater than in the other regions covered in the EBRD 2020/21 surveys.

Mobile broadband dominance	Central Asia	SEMED	EEC	SEE	EU
Ratio of mobile broadband to fixed broadband take-up	16.3 to one	7.2 to one	4.2 to one	3.0 to one	2.5 to one

[Source: EBRD 2020/21 survey reports]

The dominance of mobile broadband is likely to persist in the Central Asian countries surveyed, with the fixed broadband market forecast to grow in the medium term at around half the rate of mobile broadband growth.

Infrastructure assets include the sector specific cabling and switching equipment, almost all of which is imported to the markets surveyed, plus the physical infrastructures - mainly buildings, ducts and towers plus customer service centres (including retail shops). The specific investments in TV networks, including cable and terrestrial distribution plus satellite communications equipment, have become limited to specialist players.

Survey results – Selected Central Asian markets

Most major network players still prefer owning their own fixed and mobile infrastructures, rather than renting capacity from other infrastructure owners, or sharing infrastructures with their competitors. The extent of infrastructure sharing, or joint investments, is still very limited even though these forms of collaboration would lead to significant cost reductions. In Mongolia, infrastructure mandated in the regulations¹⁶ although broadband network operators seek to avoid the relevant “inefficient duplication” clause in the regulation by laying cables on different network routes to existing infrastructures.

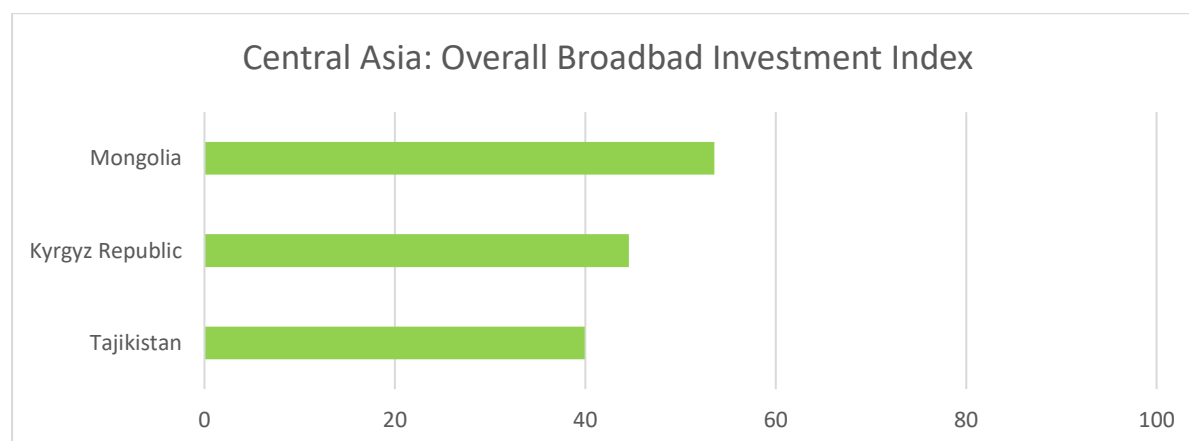
Investors in the region have in the past followed the prevailing opinion in many telecommunications markets that the pursuit of market share (favouring own-network investments) outweighs cost reduction (favouring joint investments and infrastructure sharing). However, some collaborative cost sharing initiatives have appeared, mostly amongst the more established operators. There appears to be a more positive attitude towards infrastructure and network sharing in the lead up to future investment decisions regarding 5G.

In a Central Asian market with a growing importance of broadband services, it is expected that greater investments will be made in data centres, which include storage capacity for the fast-growing use of “cloud” services. Data services growth has risen very sharply in all markets, as the number of internet users (ranging from 35% of the population in Tajikistan to 63% in Mongolia) increases. Consumer appetite for higher broadband speeds continues to develop as 4G mobile services are being deployed and fixed broadband infrastructures grow.

There is interest in additional spectrum investments, although still mostly limited to 4G growth. The investment appetite remains low for the expected future demand for a range of new business models linked to 5G connectivity – for example smart cities, vertical industry sector partnerships, transport and logistics, content, data analytics and the “Internet of Things”. Mobile service providers in the Central Asian markets are currently mainly concerned with achieving returns from their existing investments in 3G and 4G infrastructures. Commercial 5G-based services are expected to be launched only in 2022 or 2023.

Overall respondent perception

The overall Broadband Investment Index result for the Central Asian markets is shown below.



On the comparative scale, zero would indicate a perception that the investment climate is very poor. A score of 100 would indicate a perception that the overall conditions are perfect for investment.

The chart shows that in the Central Asian markets surveyed, the investment conditions are less than what respondents would ideally wish for, particularly in the Kyrgyz Republic and Tajikistan. Generally, a score of 50 or over would indicate a reasonable market for broadband infrastructure investments, whereas a score below 50, as in the Kyrgyz Republic and Tajikistan, the attractiveness of the market is outweighed by the investment risks faced. To examine the reasons, the following paragraphs highlight the factors that contribute most to the overall results.

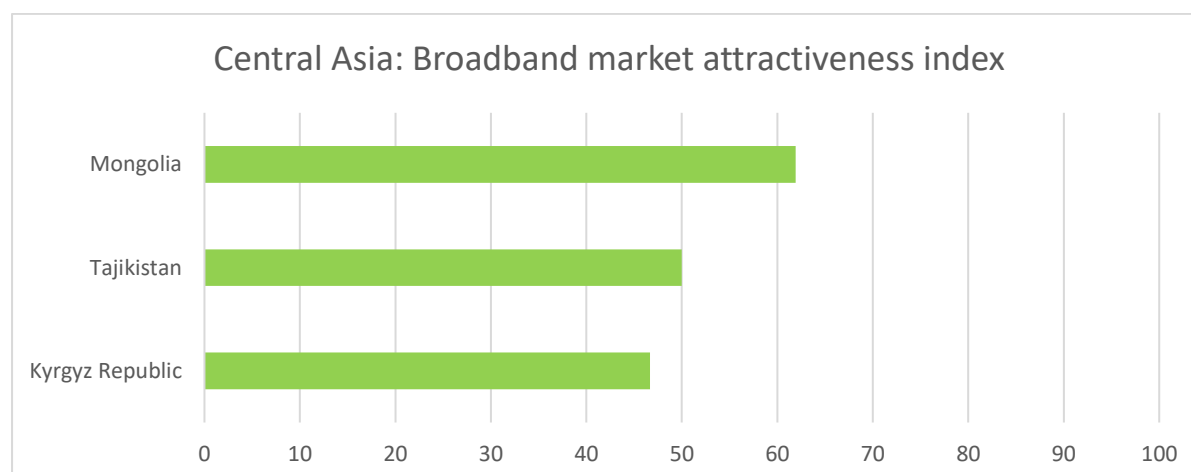
¹⁶ <https://crc.gov.mn/en/k/2IW> - see paragraph 5.3

Survey results – Selected Central Asian markets

The Overall Broadband Investment Index has been calculated from several components: market attractiveness, investment risk and confidence towards adopting best practices. The full list of component factors and the calculation methodology for each index are detailed in section 2 of this report.

Market attractiveness

The Market Attractiveness Index result for the Central Asian markets surveyed is shown below.



On the comparative scale, zero would indicate a perception that the broadband market has no attraction. A score of 100 would indicate a perception that the market potential is perfect.

For this component of the survey, participants were asked to rate only the pure market potential, disregarding initially any investment risk factors, which are subsequently taken into account in a separate analysis that is also based on the views expressed. Both the market attractiveness and the risk factors are combined to calculate the overall Broadband Investment Index.

Based on the respondents' views, Mongolia is the most attractive of the three Central Asian broadband markets surveyed, particularly for fixed broadband as users seek more reliable broadband connectivity and speed. Tajikistan has good market potential, with forecasts of very high growth rates, particularly for mobile broadband. The Kyrgyz Republic has some growth potential for both fixed and mobile broadband.

The main benchmark indicators of the ICT markets in the three Central Asian markets surveyed are shown below.

Central Asia market headlines

	Kyrgyz Republic	Mongolia	Tajikistan
Population	6.6m	3.3m	8.7m
Penetration of fixed broadband/100 population	5.3	9.0	2.2
Penetration of mobile broadband/100 population	86	105	51
% of population using the internet	50%	63%	35%
Median download speed per fixed broadband user (Mbps): The global average is 58.0 Mbps	43.9	60.1	16.6
Median download speed per mobile broadband user (Mbps): The global average is 29.1 Mbps	16.1	16.6	7.57
Forecast overall broadband market growth up to 2025 (% compound growth p.a.)	5.3%	1.6%	14.7%

Survey results – Selected Central Asian markets













[Sources: UN, ITU, Speedtest Global Index, Fitch Solutions]

Tajikistan is the largest market in population terms and is also forecast to be the fastest growing market mainly from mobile broadband services. The Kyrgyz Republic has reasonable fixed and mobile broadband market growth rates. Mongolia has a reasonable fixed broadband growth forecast, but mobile broadband penetration is already very high and further growth is limited.

The main features of each market are:

- **Kyrgyz Republic** is a relatively small market in population terms but already has a relatively high penetration of fixed and mobile broadband. Mobile broadband is expected to grow at 5.6% per annum and fixed broadband at 4.2% per annum. Median broadband download speeds are relatively high.
- **Mongolia** is the smallest market in population terms and has the highest mobile broadband penetration alongside the highest fixed broadband penetration. Forecast growth is only 1.3% per annum up to 2025 for mobile broadband and 4.1% for fixed broadband. Median download speeds are relatively high.
- **Tajikistan** is a relatively small market with relatively low mobile broadband penetration and very low fixed broadband penetration. Mobile broadband is forecast to grow strongly at 16% per annum up to 2025 and fixed broadband at 6.0%. Internet usage is not as well established and download speeds are still relatively low.

Central Asian markets: Market attractiveness factors

Market attractiveness factors	Kyrgyz Republic	Mongolia	Tajikistan
Overall size of the market, in population terms and relative spending power			
Growth potential of the market, in terms of demand for broadband-services			
Efficiency of the markets in terms of fair competitive conditions			
A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up			

 - Good /  - Medium /  - Poor

Investment risk factors

The survey sought views on a number of factors relating to sector investment risks. These factors ranged from the general and specific policy, legal and regulatory frameworks that apply to sector investments, public sector participation, the availability of digital labour skills, the procedures for granting construction and rights of way permits, overall supporting infrastructures, overall political stability and levels of corruption. A more detailed description of these risk factors is given in section 2 of this report.

Respondents were asked how important these risk factors were in their investment decision making, alongside the pull of market attractiveness. The results across a wide range of respondents gave an average relative weighting:

Balance of factors in deciding investment in a country

Respondents were asked to assess the relative weighting that market and risk factors hold when deciding to invest in a country. The results were:

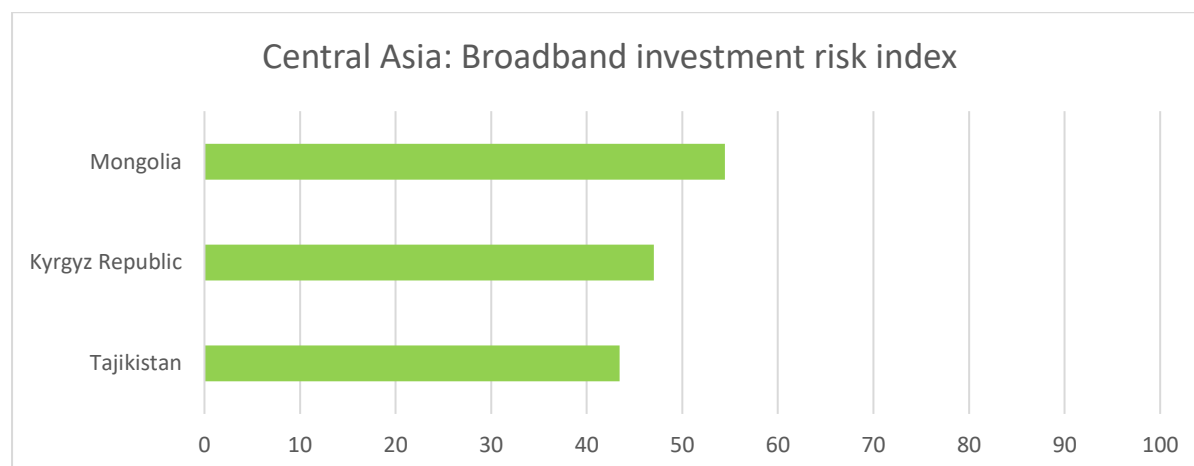
Pure market potential: Average response 63%

Investment-related risk factors: Average response 37%

Taken together, the various investment-related risk factors are therefore a key element (37%) in the decision making of respondents in broadband markets. The country-by-country results are given later in this section, leading to the identification of the most important risks facing respondents in each country.

Actions to reduce these investment-related risks are largely in the hands of policy and lawmakers in each market, alongside the regulatory and other agencies charged with implementation of the policy and legal frameworks. The findings of the survey have enabled the measurement of the perceived risk faced by respondents, leading to an identification of the key policy and improvement challenges that need to be worked on to remove the obstacles that create the investment risks.

The measurement of these perceived risks has led to the calculation of a Broadband Investment Risk Index for each market.



On the comparative scale, zero would indicate a perception that the broadband market has no enabling policy or has other absolute barriers or risks to investment. A score of 100 would indicate a perception that the full implementation of policies, legal and regulatory frameworks and other enabling conditions are already in place leaving no barriers or risks to investment.

The three Central Asian markets surveyed fall short of implementing policies, legal and regulatory frameworks and other supporting measures that would facilitate investments without barriers. The main obstacles are explored country-by-country later in this section. Mongolia was perceived by respondents as having the fewest barriers overall, followed by the Kyrgyz Republic. Tajikistan has the largest barriers to broadband infrastructure investments.

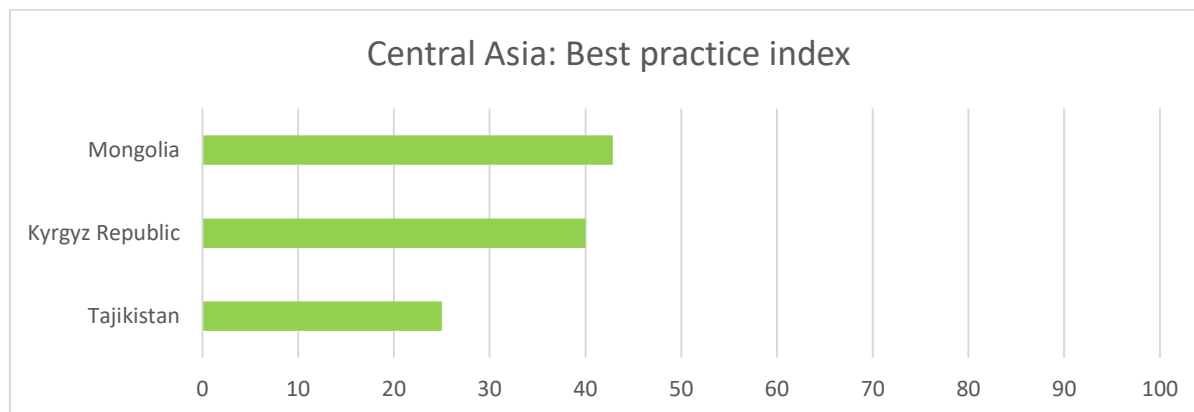
The investment risks present in each market, as perceived by the survey respondents, are analysed in more detail in the country-by-country results later in this section.

Confidence in adopting best practices

The survey has measured the perceived risks associated with broadband investments, in the view of the respondents. These risks exist today but could be reduced significantly given action by policy and law makers together with the sector regulatory agencies.

Survey results – Selected Central Asian markets

The survey asked respondents how confident they were about whether best practices will be adopted to reduce investment barriers within a reasonable timescale. The range of concerns regarding best practices for the sector is wide, from perceptions of slow progress on market liberalisation and privatisation, through to comments regarding specific procedures that can delay individual investment decisions. For example, European Union countries and others, have adopted a set of best practices specifically to facilitate broadband investment efficiencies.¹⁷ These measures include a range of procedures for joint construction, co-ordination of civil works, infrastructure sharing, access to multi-occupancy buildings and rights of way over public and private property. These best practices are especially important to broadband infrastructure investors because they can reduce costs and remove significant procedural barriers.



A value of zero would indicate that the country has no best practices relating to broadband investment conditions. A score of 100 would indicate that the country has already adopted all relevant best practices.

The three Central Asian markets surveyed are perceived to have problems in the adoption of best practices, creating significant barriers to investments. The most common concerns expressed in the survey involve the updating of the legal and regulatory frameworks to take account of new technologies, new competitive market conditions and applying the rule of law. Specific issues arising from the survey in Central Asian countries include:

- The need for governments to develop clear strategies for digitalisation and broadband expansion in order for the economy and a wider society to access the benefits of modern technologies. Government strategies should be considered in full consultation with the sector participants in order to develop clear and achievable implementation plans to achieve universal broadband connectivity of access to a full range of digital services.
- The need to move quickly towards a more liberalised and transparent approach for releasing new spectrum capacity, greater opportunities for infrastructure access and network sharing, protection against unfair competition and the creation of more effective and less time-consuming procedures.
- The need to funding measures to promote more investment in infrastructures in order to achieve universal broadband connectivity.

A specific set of procedural issues are frequently mentioned by the survey participants, particularly in Mongolia and the Kyrgyz Republic. These concern the problems experienced by investors in obtaining permits for constructing civil infrastructures. Generally, permission is required before building mobile transmission towers, laying cables and ducts, getting access to public and private properties and for installing specialist equipment. In many cases there are bureaucratic delays, multiple levels of decision making and inconsistently applied rules.

Best practice would be in place if the necessary applications could be made on-line via a one-stop-shop procedure, with all the layers of permission granting following the same effective procedures and timescales.

Survey participants also comment on the need for the sector to have more efficient practices the allocation of spectrum resources, in particular for the future growth of 5G applications.

¹⁷ <https://digital-strategy.ec.europa.eu/en/policies/eu-rules-reduce-cost-high-speed-broadband-deployment>

Survey results – Selected Central Asian markets

The findings of the survey reflect a common experience over the passage towards a more liberalised and competitive era for telecommunications and internet services. Both incumbents and new network providers have invested heavily in response to significant increases in demand, especially for broadband services. Investment strategies have generally resulted in the construction and expansion of separate infrastructures, with each fixed and mobile operator seeking to roll-out networks under their own control to gain competitive advantage.

Where options for infrastructure sharing, wholesale access and joint construction may have been considered in the past, they are normally not followed, either because the regulatory conditions are insufficiently clear or enforced, or because the investors wish to retain full control of their planning and asset management. In addition to the extra costs involved, these separate infrastructures appear as duplicated structures, for example separate masts in the same locations, multiple duct laying disruptions, and unsightly aerial cabling.

From the latest survey responses, it appears that there is now a general realisation amongst investors that new models of investment requiring more collaboration should now be considered, in order to reduce unit costs and protect investment returns. There is a parallel view that the sector's legal and regulatory frameworks will need to adapt in the expectation of this trend, especially in the lead up to investment decisions based on 5G technology and the increasing roll-out of optical fibre connectivity.

The discussions on infrastructure cooperation are active in Mongolia, where the relevant sector regulations prohibit “inefficient duplication” of ICT infrastructure¹⁸ supported by a requirement for the regulator to run a database of the existing networks. The Mongolian Information and Communications Operators' Association is leading discussions on further opportunities for active infrastructure sharing in mobile networks¹⁹.

Overall, Mongolia and Kyrgyz Republic are the markets where there is most confidence that best practice policies, legislation and regulatory practices will be applied to the sector within a reasonable time. In Tajikistan, there remains a low level of confidence that policy, legislation and regulation will develop towards best practices. The slow progress has contributed significantly to a lower level of investor confidence.

The following country-by-country sections examine the main investment barriers across the three countries surveyed, leading to the recommendations provided in section 4 of this report.

¹⁸ <https://crc.gov.mn/en/k/2IW> see paragraph 5.3

¹⁹ <http://en.micoa.mn/post/52976>

KYRGYZ REPUBLIC

At a glance

Headline market statistics - Kyrgyz Republic	2016 survey	current
Population (millions)	6.0	6.5
Fixed broadband penetration per 100 population	3.6	5.3
Mobile broadband penetration per 100 population	30	86
Internet usage (% of population)	30%	50%
Forecast overall broadband market growth up to 2024 (% compound growth per annum)	5.3%	

[Sources: UN, ITU, Fitch Solutions]

The Kyrgyz Republic has a relatively small but growing population. Growth in the broadband market is forecast at 5.3% per annum up until 2025 for mobile broadband and 5.0% for fixed broadband, both around average for the Central Asian countries surveyed. Geographical areas outside the main population centres remain relatively underserved, particularly with fixed broadband connectivity.

Survey results

Kyrgyz Republic	Rating	Central Asia sample average	Central Asia sample Ranking
Broadband Market Attractiveness Index/100	47	53	3 rd
Broadband Investment Risk Index/100	47	48	2 nd
Best Practice Index/100	40	36	2 nd
Overall Broadband Investment Index/100	45	46	2 nd

In general, an index above 50/100 indicates a relatively a good market for broadband investments.

The survey results show that Kyrgyz Republic is perceived overall to be an averagely attractive broadband investment market of the Central Asian countries surveyed. The three component indexes for market attractiveness, investment risk and best practice all show below average conditions.

What respondents are saying about the market

Market size and potential

"We are willing to invest and we have funds supporting us."

"We use various technologies for fixed broadband and we are expanding our infrastructure out to more cities."

"The business-to-business segment is very attractive, bringing profits."

"Covid was a good impetus – people realised that broadband is a necessity."

"There is more broadband demand now so we are expanding to rural areas."

"There is demand and it now even exists in remote areas so now we are going there."

“We get many more requests so we are trying to improve our network and connectivity.”

“The government Ministries are starting to set up pilot projects to establish their internal digital networks.”

“Businesses are building their internal digital networks.”

“There is a new market strategy aiming to improve the efficiency of services to multi-apartment buildings.”

“The outlook for 4G is very good.”

“New spectrum will enable us to launch 5G in the future, but it will be very capital intensive and the government has to publish a document before we can launch 5G services.”

“The new spectrum releases give us different options for roll-out of 5G.”

“5G is for smart things, including the Internet of Things – it is more for the future and we need to wait.”

“We have some security going forward with the new frequency resources. “

“There is potential for growth in the fixed broadband sector, depending on the location and competition.”

“It is a little early for 5G, there is not much demand.”

“5G will remain a key focus for the next couple of years.”

“We hope 5G will not come next year.”

“It is very unlikely that the mobile operators will invest in 5G because they have not finished 4G investment yet.”

“The general mood among the technical community is that 5G will not be a good business.”

“We are not considering wireless - we are focussed on cable technology because the situation is clearer.”

“Internet is at only at a medium level but there is a strong demand.”

“The experience of other countries in assisting investments could be useful to the sector in Kyrgyzstan.”

“We are waiting for a World Bank digitisation project to start, with \$50m provided, including for optical fibre infrastructure.”

“In principle, there is a law on public-private partnerships, for example a deal with a satellite service, to serve the mountainous parts of the country.”

Current market conditions

“Around 90% of the population is covered by mobile but for fixed broadband the country's topology makes it difficult.”

“The terrain is such that we cannot get there by fibre so mobile is needed for connectivity.”

“We have many internet users getting low speeds and quality in rural locations. It's better in the cities.”

“There are two key barriers to broadband expansion – financing investments and services affordability.”

“The local banks are pawn shops and the only way to offer security is to have collateral in real estate.”

“Finance is available from commercial banks but they lend against securities and but many companies don’t have sufficient assets.”

“Regional towns and centres are covered by fibre broadband - but not the rural areas because the financial returns are not there.”

“For connecting the remote villages, the cost is high - many companies simply lack financial resources to build fixed infrastructures.”

“Laying fibre in the high mountains and more remote areas is difficult.”

“Mobile broadband has the highest demand; fixed broadband is too expensive.”

“Cable-based access is much easier and a relatively safe investment, wireless is much more difficult.”

“Investors are not so happy to invest in spectrum because they have to invest a lot up front and the future is less certain.”

“In the cities, high speed users switch to fixed broadband. But in rural areas, the usage is low so predominately mobile broadband is used.”

“We have lots of competition now in the digital market and we have more infrastructure to enable us to connect schools and hospitals in rural areas”

“People are not ready to pay a lot for fixed broadband and the regions are not happy to pay as much as in the cities.”

“Where there is competition, fixed broadband is more affordable.”

“In the past, customers paid for the initial connection but competitors are now offering free connection so this has put pressure on cash flow and financing.”

“The incumbent operator has introduced reliable broadband technology, fibre and wireless, but needs to leave behind their traditional approach of public procurement which slows them down.”

“Fixed broadband is very low and mostly basic xDSL. There is very little optic fibre.”

“The general feeling is that mobile broadband is ‘good enough’ rather than of high quality.”

“In the fixed broadband market there are some small companies that have licences but investments are highly concentrated, mainly into the cities at the moment.”

“We try to invest in rural areas as a way of promoting ourselves as a responsible company.”

“For distant locations our investments amount to social community service.

“We do not serve many remote communities; we can do some places where it’s ok for us.”

“4G will eventually cover 100%, these are certain investments, - everyone is doing it.

“We have an obligation, based on our licence – to serve distant villages with base stations.”

“We have self-generated finance but need more funding options in order to increase our capital investment on equipment to expand our coverage.”

“The main problem is lack of finance because the cost of laying cables in remote areas is high and consumer earnings are very low.”

“We are interested in regional networks, we already have a main line between cities, in other regions we will cooperate with other networks where copper is mainly used.”

“We will use fibre to connect businesses and multi-tenancy buildings.”

The overall strategy for the sector

“Broadband can increase public services available in regions, for example eGovernment services like passports, driving licences, services for other agencies and public safety.”

“Some remote areas do not have voice or internet. But the ‘Digitalisation Concept’ will seek to resolve this. The government is planning to provide some benefits/ exemptions.”

“We have to make sure that social services – education and health - are funded by government. The Cabinet of Ministers has signalled that the incumbent national operator will get special status as national provider of telecommunications.”

“Education sector investments need to obtain a special entity status – at the moment the government's plan has been based on commercial services based on mobile applications used by qualified teachers giving on-line classes.”

“Unfortunately only 80% of schools are connected and we also need to develop content for education services.”

“There are lots of ready-made solutions, like the eGovernment services in Russia, but we are not a big county and we need to tailor the services to suit our needs.”

“For 2022 the government will launch a 5G pilot, encouraging experienced investors.”

“There is also the “Concept of the Digital Economy” 2022/26” document. It's a general plan, from which will come a road map/ action plan, which will be approved by the President's office.”

“The government wants to start 5G but operators don't want it because we will have to make more investment with no returns in the short term.”

“The government does not have a clear understanding of the role of 5G, where it will go and how it will be funded”.

“The government meet with us to discuss their motivation; this is something new.”

“There is no government strategy - we have not heard of it or aware of it.

“It would be good if the government could be more proactive in promoting the sector – for example to reduce ‘radio phobia’.”

“There is no clear understanding of how and where 5G will be tested, they say that they will issue some frequencies - but there are no details of a roadmap.”

“We discussed with government our concerns about 5G and tried to explain. They have their vision but we don't see any clarity on benefits for the government, the country or the businesses.”

“There is no clear strategy, only some discussions, maybe the strategy will come next year”.

“Most of the incumbent's staff have been there for a long time. They have to preserve cultural life whilst building a digital future too.”

“The experience of foreign countries needs to be applied here, but now there is no one that participates in foreign discussions so that we can benefit from this work.”

“The world trend is digitalisation, which should include all regions in the country as a catalyst to economic and social development.”

There has been some growth in broadband demand and supply, with investments in 3G and 4G mobile coverage. Penetration of mobile broadband has reached 86 per 100 population, slightly above average for the Central Asian countries surveyed. Optic fibre has been introduced in the main transmission routes but the majority of fixed broadband connections are still using legacy copper access networks. Fixed broadband penetration is limited mainly to businesses and high-speed users in the cities and remains very low when compared to European countries, particularly in rural areas.

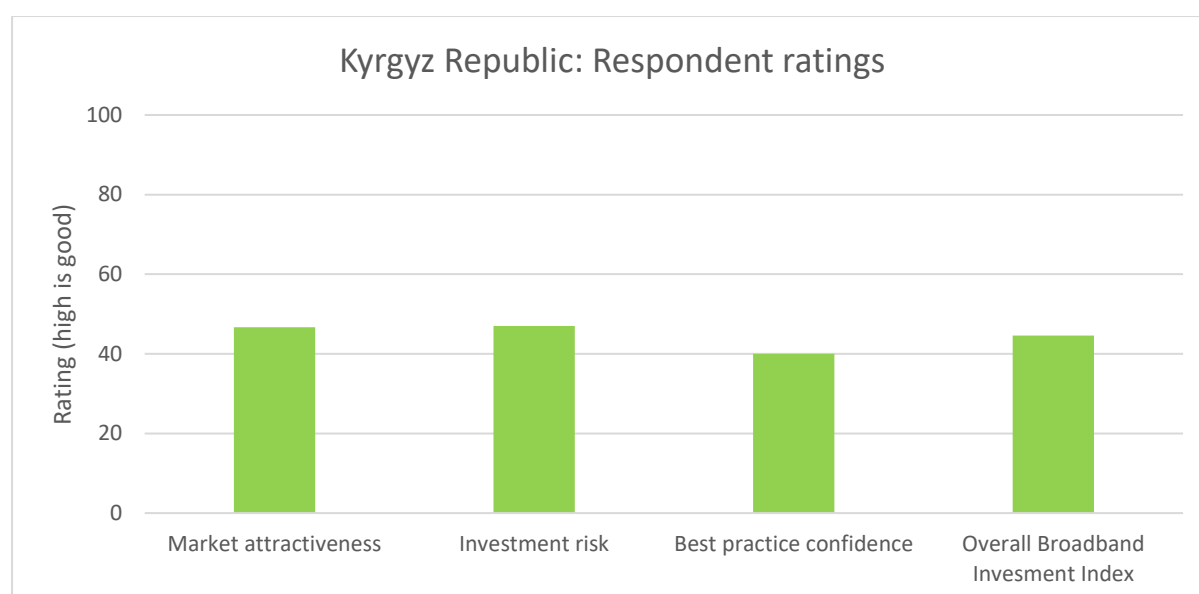
Survey results – Kyrgyz Republic

The sector faces some significant challenges, including the development of clear policies for digitalisation of the economy, the need for expansion of broadband connectivity to low population areas, spectrum management, the role of 5G and the justification and timing of 5G investments.

To set clearer policy and to address these challenges, a new 'Digital Concept' is emerging to clarify plans for the digitalisation of the economy and to support investments in the ICT sector. A key question to be resolved is the role of the state-owned operators in building new infrastructures alongside private operators. State ownership and funding can create competitive market inefficiencies by crowding out private investments. In the view of the survey respondents, this factor contributes to the investment risks, particularly outside the main population centres where demand for broadband is still weak and infrastructure costs remain high.

The existing impediments to investment identified in this survey in the section below provide the immediate priority areas for reform. Recommendations in each priority area are provided in section 4 of this report based on best sector practices in mature broadband markets.

In the new era of digitalisation, there are other issues such cyber security and critical network resilience have come to the fore during the COVID-19 pandemic but have not been identified for the Kyrgyz Republic as immediate priorities. The telecommunications related issues arising generally from the COVID-19 experience are further considered in the Annex to this report.



The overall Broadband Investment Index (right hand pillar) is calculated from the three indexes represented by the first three pillars. The full calculation methodology is given in section 2 of this report. For each pillar, the higher the score, the better the conditions are.

The Kyrgyz Republic has only a medium score for market attractiveness and best practice confidence. Investment risk is considered medium, as measured by the broadband investment risk index. The top concerns are political stability, the role of the state and state funding plus legal and regulatory issues. Other investment risks are relatively low in Kyrgyz Republic, including trade barriers and labour regulations.

The overall index of broadband investment Index rates Kyrgyz Republic as an average investment climate among the Central Asian countries surveyed.

More detail regarding the main investor concerns is given in their comments below.

Respondent views

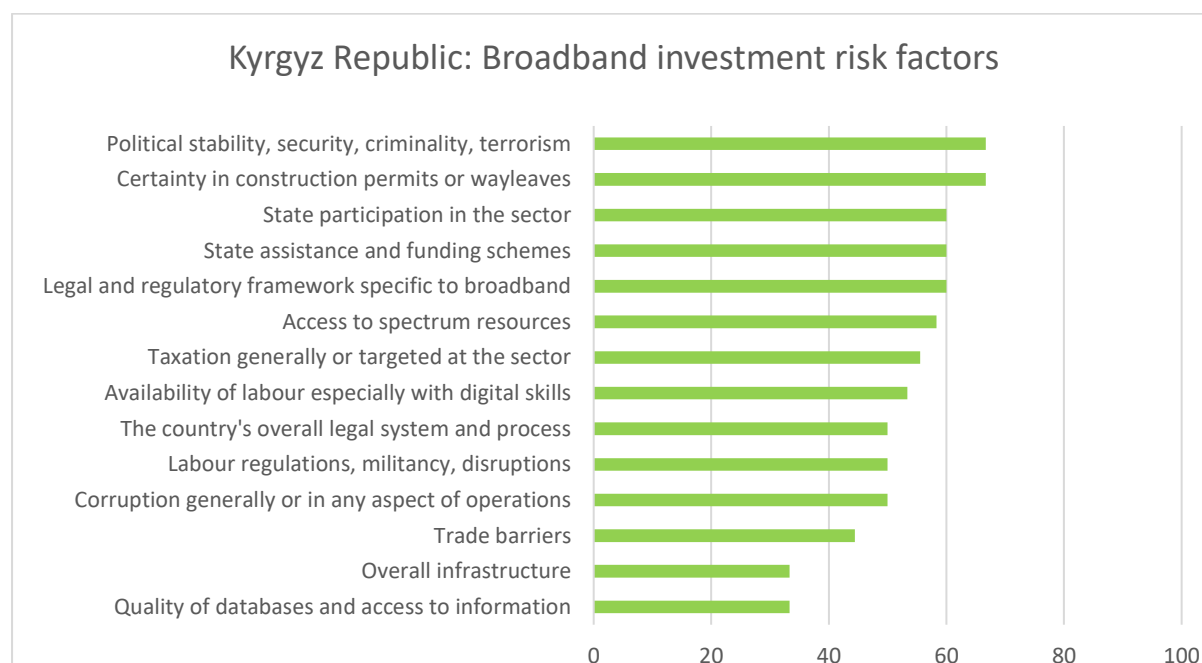
The survey considered 14 factors related to investment in ICT infrastructure. A description of these factors is given in section 2 of this report. Respondents were asked to express their view on whether the conditions for investment are affected by each factor in any of the following ways:

- Positively encourages investment

Survey results – Kyrgyz Republic

- Does not deter investment
- Mildly deters investment
- Strongly deters investment
- No opinion.

By assigning relative scores normalised to a scale of zero to 100, each factor has been ranked in terms of how much it contributes to investment risk.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

Respondents perceive that issues that contribute the most risk to broadband investments. relate to political stability and the delays and costs associated with the granting of permits for constructing infrastructure. State participation in the sector, the use of state subsidies plus the associated legal and regulatory risks as applied to the sector, also contribute significantly to the risks faced by investors. Parallel concerns are the uncertainties of access to spectrum, the taxation applied to the sector and the shortages of staff with the required digital skills.

Other factors, including trade barriers and the country's overall infrastructure contribute less to investment risks.

The following comments give more details of the specific concerns of investors.

Political stability

How respondents expressed views about political stability in Kyrgyz Republic

"Compared with previous election it is quiet – there were some errors in the system - we hope it will end without re-running the elections - we don't want instability."

"The participation rate in the election was low - major parties have their own promoters - the same political players are contesting."

"It's a good improvement, everyone just wants peace and stability."

"Unfortunately when there is a change of government, they dig into decisions and big companies come under close scrutiny because they have money."

“in reality the interpretation and approach from government is open to interpretation.”

“There is always a risk from new government and new parties.”

“The political situation is unstable and does not attract foreign investments.”

This survey of investor views in the Kyrgyz Republic took place late in 2021 following a period of significant political uncertainty. The previous twelve months had seen a disputed general election result and public demonstrations, an annulment of the election results, constitutional reform and a rerun of the presidential and parliamentary elections following several delays.

This prolonged political uncertainty has significantly reduced investor confidence. Based on previous experience in the ICT sector, the survey participants expressed the fear that any new government could question decisions made by the previous administration, for example on the award of spectrum to operators. If this was the case, and spectrum allocations were altered, the investment plans of the operators could be significantly affected.

The survey respondents also expressed a more positive view that with changes of government, there could be more support for the ICT sector. For example, some respondents expressed optimism that the new government will develop a clear national strategy for digitalisation of the economy with support for new investments in broadband infrastructure, services and connectivity.

Recommendations for the improvement of digital policy and investment promotion are given in Recommendations 1 and 2 in section 4 of this report.

Granting of permits

How respondents express their views on permissions and wayleaves in Kyrgyz Republic

“We need to get permission for the construction of towers and laying optic fibres underground or on electric poles.”

“There are many cases where owners deny permission to use their facilities or land – this makes it more costly and it takes more time.”

“There are no regulations or laws - we have an Association of Network Operators and a business council to work through, but we need a law obliging owners to allow construction.”

“The majority of issues is with owners of land plots – obtaining permissions.”

“Radio phobia is the reason that is often used to deny access to private land. The Association of Network Operators is lobbying with us when we face private landowners.”

“For access to state property - we have a similar situation - we have to seek consent and unfortunately we encounter the same problems in time and cost.”

“We can find ways round the problems but we lose time and money.”

“For access to public land, usually we can get the locations, there is only one government entity involved”

“The problem is the time and cost of getting permission to use land and access to state infrastructure.”

“The problems are not large and disputes are resolvable, the municipalities provide support.”

“The regulator has all the authority to resolve issues and it coordinates with other government departments to resolve.”

“People were unhappy and against mobile stations but this is being resolved.”

Survey results – Kyrgyz Republic

Of particular concern are the current inefficiencies in gaining the necessary permits for the civil works typically associated with broadband infrastructure investments (including buildings, manholes, ducts, masts, towers, poles and street cabinets). Companies normally have to seek certain permissions before construction work can begin. These permissions can include access to public or private rights of way, approval of construction details and permits to carry out civil works. The survey respondents express the view that the negotiations have to take place separately with each private or local government landowners with no standard processes or clear legal basis.

The problems are exacerbated in Kyrgyz Republic by a belief amongst some permission granters that mobile phone frequencies could cause health problems including cancer and Covid. The government (both national and local), regulator and the Association of Network Operators appear to be supporting the operator's case in requesting permits by trying to allay the fears of the private landowners. The difficulties in the granting of permission generally lead to time delays and increased costs for broadband infrastructure investments.

This could be improved by a strengthening of the legal basis and the streamlining of procedures for obtaining permits (see also Recommendation 4 in section 4 of this report).

State participation and subsidies in the sector**How respondents expressed views about state participation and state subsidies in the ICT sector of Kyrgyz Republic**

"The state companies give 100% of their dividends to the government, they need to retain cash but their pleas are left unheard."

"There are no government programmes."

"Currently the Ministry of Digital Development is working on the plan for 2022/2023 which will be very active for optical fibre investments by Kyrgyz Telecom."

"The World Bank project includes \$15m for optical fibre infrastructure."

"In 2022 the government will commence the tenders to select the winners to build the broadband infrastructure to the 33 settlements identified"

"The building of infrastructure to the remaining unserved may have to be reduced because some of the identified places do not have any power supply."

"Government support is there for investment in social infrastructure, for example schools, hospitals, it's up to investors."

"It's not necessary for the investor to specify the benefits/ privileges it needs in their proposal; it simply has to say it intends to invest and the government will then suggest benefits/ privileges available to help the investments."

"There would be funding under the PPP model, the government is ready with money and property benefits in kind."

"One company that provided broadband services to schools had to pay a large tax bill and was fined, so they closed down and the school services and company jobs were lost."

"The operators provide services to police, embassies and health centres on a case-by-case basis, for large-scale projects there is no help."

"There is a new concept from the Cabinet of Ministers – with the state-owned operator having to bid for projects that will upgrade the national network infrastructure for digitalisation."

"The international tender will have both fixed and mobile broadband components."

“There will be an open international competition - the winning bidders will build and expand the existing networks for social activities. Kyrgyz Telecom will be a leading bidding entity and there will be other consortium partners.”

“There will be competitive bidding in 2022 for an international tender, with a project management unit to monitor the implementation”.

“There will be no up-front payments, the money will only be paid post audit.”

“There are no government subsidies to reach rural areas.”

“For the state-owned incumbent, fixed wages are restricting the growth of marketing - they have to grow by buying an ISP that knows how to promote customer loyalty.”

“The state-owned incumbent needs firstly to make its internal processes efficient and transparent in order to digitalise its operations.”

“On the ‘radio phobia’ problem, there are some governmental committee institutions providing some help - sometimes not. It depends on the specifics of local communities and local government; this happens in rural areas and cities.”

“We sit down with the community, using local expertise and local government sometimes helps.”

“The government has a clear understanding of the importance of broadband to improve education and help stop the outflow of teachers in the regions.”

“We have been accustomed to help ourselves and cannot rely on others. We are happy to take apart in any government schemes but we cannot expect anything from above.”

“The government has to look again at the sector and do more to support it given the focus on broadband highlighted by the experience of Covid.”

“50% of rural hospitals are already connected to broadband and this helps to train the rural specialists using specialists in Bishkek.”

“When the state budget announces tenders for optic fibres to schools – the fixed broadband operators participate in these tenders regularly.”

The government is happy to have investments in mobile broadband to remote locations using public-private partnerships.”

“If the investor makes long-term commitments together with government, then the government will honour this commitment.”

State involvement in the sector

In the Kyrgyz Republic there has been underinvestment by the state-owned incumbent operator Kyrgyz Telecom, resulting in low levels of fixed infrastructure and services penetration, particularly in rural areas. Private mobile investors have led the way in expanding mobile networks. Mobile broadband (3G and 4G) coverage has now reached around 90% of the population. Fixed broadband penetration remains very low, particularly in rural areas.

The state still owns significant network assets, including the main fixed operator Kyrgyz Telecom and the mobile operator MegaCom. The public and private operators can agree wholesale arrangements to lease or share infrastructure capacity from one another, but the charges are largely unregulated and rely on commercial agreements. Most fixed broadband services are provided by Kyrgyz Telecom, with competition arising largely from smaller localised internet service providers.

The experience from other countries suggests that the existence of state-owned operators competing in a largely unregulated market alongside private companies tends to result in sub-optimal outcomes in terms of market and economic efficiency. This is because:

Survey results – Kyrgyz Republic

- Unless the charges for this wholesale rental of capacity are regulated on a fair, transparent and cost-related basis, the charges made by the larger operators (particularly an incumbent) will tend to be higher than the costs relative to a modern cost-efficient network. The respondents to the survey expressed the opinion that the efficiency of Kyrgyz Telecom's network is not what should be expected from best practice broadband technology.
- The private sector companies tend to invest in their own infrastructures, either because the incumbent networks lack sufficient quality or coverage or, more commonly because the private companies exhibit a strong commercial imperative to make timely investment decisions independently of other operators. This has been the case in most competitive telecommunications markets, particularly in the early and high-growth phases of mobile market development.
- In the case of fixed broadband services provision, competing internet services providers have often had little choice but to use the existing infrastructures of the incumbent fixed network operator. This is largely because the cost of laying new ducts and cables is high and the need to obtain permission to build new infrastructure is often complex and time consuming.
- Unless there is clear (and policy-led) sector coordination between private and public sector players, total coverage in geographical areas of relatively low demand and high cost will rarely be fully achieved. If the private sector acts alone, there is not sufficient profit incentive to invest in unprofitable areas. If left to the public sector alone, then the lack of effective competition will leave the rural markets for broadband services with insufficient consumer choice and quality.

In the view of survey respondents, clear policies for digitalisation and universal broadband coverage have yet to be developed in Kyrgyz Republic.

In order to improve the investment conditions for all investors, different policy and regulatory approaches have been used in different countries. Many countries have solved the problems caused by differences in objectives between public and private sector interests by privatising the state assets, leading to a more common set of commercial outcomes amongst the players. Other countries have left the market entirely to the private sector and have been disappointed by the 'digital divide' resulting from lack of commercial investment in low population areas and where costs are highest. In these cases, one option has been to reintroduce state-owned networks to provide open access and low-cost capacity to the underserved geographical areas, so that the private sector can use this extended capacity to serve markets that they do not plan to reach entirely with their own infrastructure.

Whatever the resulting balance between the private and public networks and their relative market shares, there will generally be a need for clear and transparent market regulation. This is covered in the paragraphs below relating to the survey findings on the legal and regulatory framework.

For a fully efficient investment market, a clear framework of sector policy is required. This is considered further in Recommendations 1 and 2 in section 4 of this report.

State subsidies

According to the survey respondents, there appear to be no formalised system of state subsidies for the broadband sector in Kyrgyz Republic. In many countries, state subsidies seek to promote investments in telecommunications infrastructure to make services universally available, even in the more remote areas where commercial investments are not made. In Kyrgyz Republic, mobile broadband service coverage has now reached around 90% of the population, but good quality fixed broadband services are not yet generally available outside the main population centres.

At the moment, the connection of state entities in Kyrgyz Republic (including schools and health services) appears to be made under normal case-by-case service provision arrangements, with the state paying for these services like any other business entity.

Survey respondents have stated that there although the detailed policies and subsidy mechanisms have yet to be formalised by the new government, it appears that the government's emerging 'Digital Concept' will include the construction of new state-funded infrastructure to extend the digital network out into geographical areas where very little telecommunications currently exist. The survey respondents believe that the construction will be led by state-owned Kyrgyz Telecom, in a consortium with other companies, to build and operate the extended broadband networks and services. The budget for this major new broadband

Survey results – Kyrgyz Republic

infrastructure investment includes funding from the World Bank. It is unclear if a consortium led by Kyrgyz Telecom will have to bid competitively against other operators, or if the tenders will be open to involvement by foreign as well as domestic investors. Another aspect that needs to be clarified is the role of private sector operators that are not included in the winning consortium – for example, will the new infrastructure be open to any existing or new service provider to use in providing competitive broadband services? If so, what will be the associated regulatory obligations placed on the infrastructure owner, in terms of the wholesale services and charges?

Respondents to the survey have expressed a need for clarity of the new state-led digital infrastructure plans in terms of ownership and operations, the legal and regulatory framework for access and the rules for participation in tenders for the proposed state funding.

The associated policy framework for the digitalisation of major state services, notably education and healthcare plus other government services, also needs to be clarified by the new government. There also needs to be consultation with private sector-led industries in Kyrgyz Republic to promote their own digitalisation programmes leading to greater economic growth. For example, the government needs to assess the level of digital skills required to manage the required changes and to ensure that higher education is resourced to produce the numbers of graduates with the relevant digital skills.

Examples of best practices regarding the state involvement in the sector and the use of state aid for broadband expansion are given in Recommendations 5 and 9 in section 4 of this report.

The legal and regulatory framework for broadband**How respondents expressed their views on the legal and regulatory framework for broadband in Kyrgyz Republic**

“We have issues regarding the need for clarity in our legal and regulatory system.”

“They cannot find proper specialists to join the regulator and no one wants to work there.”

“The regulator is not in a good situation; it exists but there is not really any regulation - just administration.”

“In regulation there has been a disconnect, a downward turn.”

“The regulator is very weak. They tried to find a balance between the large and small players, but everything is now focussed on the large players, both mobile and fixed.”

“Digital services are developing very fast - not everything is clear yet – we need to make judgements, so we need clarity of norms and regulations - to improve certainty.”

“In the local network there is not so much investment, the market is not subject to any regulation apart from spectrum.”

“There is a need to strengthen the regulatory framework if the country is to develop digital commerce.”

“The government national infrastructure project will be implemented by a new body that will define a full legal framework for the projects, there will need to be changes in the law.”

“We have been working since 2010 on changes in the law, the operators are all pressing for it but it moves very slowly.”

“Legal changes are the main debate with the government and regulator.”

“It all relies on the changes demanded by the operators, but the government does express its openness to change.”

“There are some gaps in spectrum legislation and as this is a large topic, we need more time.”

Infrastructure access and sharing

“There are no regulations.”

“We rely on own infrastructure; sharing is at low level.”

“The operators went through the anti-monopoly committee to get the wholesale charges down. They succeeded in getting the rates down but now fear that they could go up again.”

“In general, 90% of services are provided over our own network, if we need some reserve capacity for back-up, we rent from another operator and they do that in return with us.”

“The main fixed and mobile operators all need contingent service capacity to use as back-up.”

“For last mile access we can use direct the connection of other operators and just rely on our own billing centres in those cities.”

“Coverage is the differentiator - everyone has to have their own sites to win on mobile coverage.”

“Sites and towers are not usually shared; everyone goes their own way.”

“We cooperate with others - the country is mountainous and building infrastructure is expensive.”

“The telecommunications operators proposed a concessionary rate for using the poles from the energy sector. But they did not hear us - they did not take into account the benefits we would be giving to the community.”

“There are local companies with an electric grid, so we would have to deal locally case-by-case.”

“We don’t need to build our own lines; we have the option to use other operators.”

“There is no unified approach and nothing in the law – each case is very different; the regulator does not move on this and it remains up to the consent of operators.”

“It’s just a matter of negotiation using any leverage an operator might have. For example, we managed to convince them by saying that we would build ourselves to make the agreement mutual, so they agreed.”

It is clear that the survey respondents do not have sufficient confidence in the sector regulator’s capacity to establish and operate a clear legal and regulatory framework for a modern broadband investment market. The existing framework has not yet been updated for the fast-developing market, leaving many investment decisions subject to uncertainties and delay. The survey respondents have expressed a clear need for a comprehensive digitisation policy to be presented by the new government, together with actions to improve the legal and regulatory framework in support of broadband infrastructure investments.

Of particular importance to investors will be the regulatory measures that are needed to promote efficient broadband investments in a competitive market, taking advantage of any best practice cost-reduction measures, including improved infrastructure access (within the broadband sector and by using the infrastructure of other utility services), network and spectrum sharing, joint construction and coordination of civil works.

Investors in broadband infrastructure do not feel that the overall legal system in Kyrgyz Republic sufficiently encourages or protects their investments. The existing measures are seen as too general and do not recognise the growing importance of the ICT sector to the economic development of the country. General

Survey results – Kyrgyz Republic

consideration regarding overall commitment to the sector and the specific investment-enabling legal and regulatory framework for broadband are given in Recommendations 1 and 3 in section 4 of this report.

Spectrum issues**How respondents express their views on access to spectrum in Kyrgyz Republic**

“In the EU there is always a spectrum strategy, but here there is none. In the past we had spectrum experts, now it is just lawyers to penalise people for their past actions.”

“All spectrum allocations are now done by auction, there are no impediments and licences are issued for 10 years.”

“The government had an auction. We are going to invest - now we are ready.”

“It is important we have frequencies based on laws and regulations so that no one in the future challenges it.”

“A tender for 5G spectrum was announced but it was only for the capital city.”

“The Ministry of Digital Development has prepared a draft decree about launching of a 5G pilot in 2023.”

“The government and regulator have already decided on the spectrum for 5G and decided to do it by auction.”

“The auction will have no limits, anyone can become a participant, they only have to be a legal entity in the country.”

“The regulator will invite foreign telecommunications interest if the established operators show no interest in launching 5G.”

“The regulator can negotiate with operators, who will in turn be talking to equipment suppliers.”

“For the reserve fees, we have a methodology adopted in 2017 - rates for each part of the spectrum have been set.”

“The recent spectrum allocation for Bishkek was for 4G and all operators needed more spectrum.”

“There are some problems about the use of regional auctions because operators prefer to stay in the cities, this has been the case for 30 years.”

“Demand for more spectrum was high so the price paid was unexpectedly high – the government fixed the price.”

“When licences are not extended, the reasons are not clear.”

“In the past, if frequencies were available, they were given, so operators took them and held on to them.”

“So the regulator made it a requirement to use these frequencies and said they would take them back if the operators did not comply.”

“The regulator did not extend existing licences – there were lots of cases where frequencies were taken back.”

“There is so much contradiction about mobile signals causing cancer and Covid. It is another challenge, we face ‘radio phobia’.

“We have ‘radio phobia’ relating to 4G and if we start on 5G, many people will be wary.”

“Spectrum is not that easy to get.”

“The recent spectrum actions were on a regional basis; they did this to get some more money. It’s a strange split but we have to accept it.”

“Smaller new entrant operators got some licences before 2017 when the government started auctions.”

“Some smaller players got spectrum cheaply before 2017, but they did not use it efficiently.”

“The government have prepared some frequencies for 5G, there has been a discussion on spectrum fees balanced against investment needs.”

“We already have existing spectrum that can be used for 4G or 5G, but the regulator is going to release additional spectrum for a 5G trial.”

“We are thinking of buying a wireless operator, but we are not sure about the spectrum policy.”

The process for spectrum allocations in Kyrgyz Republic has now been changed from a first come-first served basis to an auction process. This allows existing and new entrants to bid openly for new spectrum releases and recent spectrum auctions have allowed the operators to extend their 3G and 4G services. The survey respondents have expressed their views regarding the high prices paid at auction and the limitations on them from the government’s use of regional spectrum licences. For example a recent spectrum auction only granted a licence to extend service capacity in the capital city region of Bishkek. This type of auction is therefore seen by the survey respondents as a means of maximising the amount of money collected, rather than a way of distributing the available spectrum in the most market efficient way.

The next key challenge for spectrum allocations in Kyrgyz Republic, as in many other countries, is the need to ensure that there is sufficient spectrum available for the full exploitation of 5G technologies. Today’s mobile operators are still to complete their current investments and the returns on those 3G and 4G investments are not guaranteed in the short to medium term. At the moment, the survey respondents have expressed a clear view that the case for future 5G broadband infrastructure investments is not clear and that, based on the currently seen demands, the Kyrgyz Republic market is not yet ready for 5G.

In most countries, the anticipated value of 5G technology is seen to extend outside simply the expected performance improvements or any financial returns to the broadband sector of the economy. Whole industrial and governmental sectors of the economy and society as a whole are expected to benefit from 5G technology, including its role in the growing ‘Internet of Things’. In this context, investors need to consider their 5G infrastructure investments using more collaborative business models involving other market sector players.

If Kyrgyz Republic is to take full advantage of the expected transformational benefits of 5G and its related applications, then the procedures for allocating 5G spectrum need to be re-considered in relation to a much wider potential for exploitation, taking account of the needs of a larger number of market sectors, industries and governmental services (see also Recommendation 9 in section 4 of this report).

Other issues

How respondents expressed views about other issues in Kyrgyz Republic

Taxation and trade issues

“As usual what is important is clear taxation policy.”

“There is a sales tax - using different rates, mobile services are 5% and fixed operators only pay 2%.”

“We do not have a standard definition of a mobile operator, so some companies got a bill and could not pay – it’s a poor situation.”

“The additional mobile tax was introduced ten years ago when margins were high.”

“The taxes are standard - we have to pay to regulator 9% on quarterly basis.

“Overtaxing will have an impact – the revenues of mobile operators have been falling in recent years.”

“We have had long lasting disputes.”

“Our local tax code includes tax on international roaming and international interconnect.”

“We have been able to settle our tax disputes this year, but these are problems for us and the time spent on them is useless.”

“The local way of treating VAT on international roaming and interconnection is different from international norms.”

“There are still some discrepancies in VAT treatment of some services giving grounds for increased risk for our company.”

“We buy from vendors in China and Covid has increased lead times, we depend on the conditions at the border.”

“There are no local manufacturers - we need optic fibre cables but so far we have had no issues there.”

“The situation is not stable now - related to Covid - so far it's back to normal now but some forward risks remain because of the uncertainties on Covid.”

“We cannot say if our equipment purchase price is good and so far there have been no changes in price, so we pay what we pay.”

“There is a ‘grey’ market and the government want to clean this up.”

Digital skills shortages

“This is a problem; we see very skilled people trying to leave and work here for international companies.”

“Overall there is a lack of skilled resources and this applies to all companies.”

“We have a small IT academy training our own resources at a school level.”

There are great difficulties in obtaining skills - we have had issues with software developers – they are in high demand from foreign companies.”

“This year we experienced a deficit of these skills, so we are trying to retrain, using on-line training and incentive schemes.”

“We have strong experts, so the concept of a “digital economy”, when approved, will contribute to growth.”

Labour regulations

“In the pandemic we worked remotely and because there are no rules for this in the labour code, we found our own solutions.”

“The labour code is introducing many changes, making it less flexible so we try to get round it”.

The survey respondents expressed the view that the special taxes on the telecommunications sector extract cash from the operators that could otherwise be used for investment in broadband infrastructure expansion. The state receipts from the operators are not yet directly ploughed back into the sector in support increasing connectivity or take-up of broadband networks and services.

Tax issues are further examined in Recommendation 8 in section 4 of this report.





Survey results – Kyrgyz Republic

The views expressed by respondents on the availability of digital skills in Kyrgyz Republic echo the views expressed in most other countries surveyed. The concerns cover not only the limited availability of skilled staff to work in broadband networks and service suppliers, but also in the skill levels of consumers and businesses which could limit future broadband usage and market growth. Further analysis on both the demand and supply side responses are given in Recommendation 7 in section 4 of this report.

Recommendations

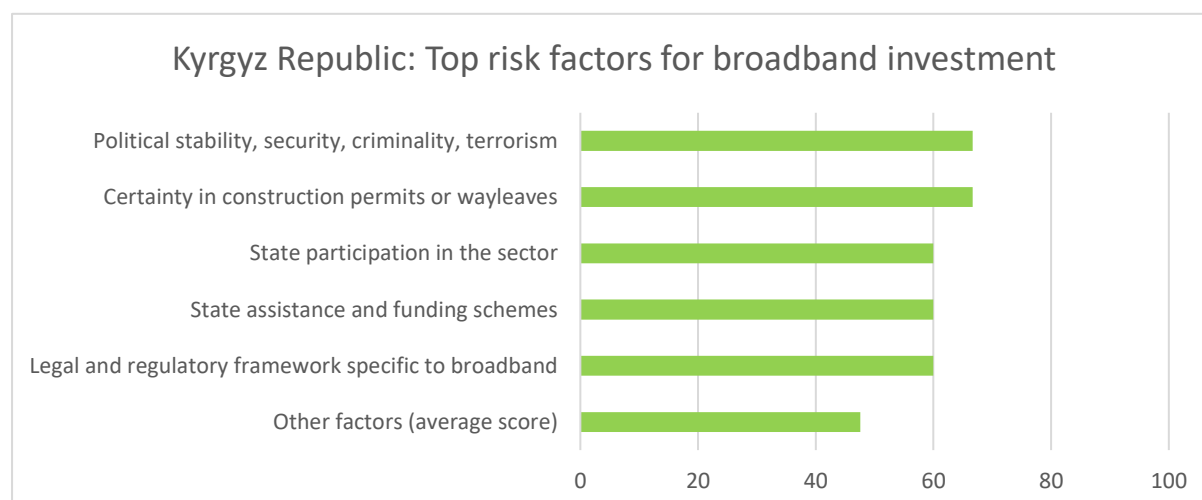
The detailed recommendations in this report are given in section 4. There are two types of recommendations, the first type to improve the overall attractiveness of markets and the second type to reduce investment risks.

For Kyrgyz Republic, the respondent views regarding market attractiveness are summarised below, together with the relevant recommendations for improving the overall attractiveness of the market.

Market attractiveness factors	Kyrgyz Republic	Recommendations for improving the overall attractiveness of the market (See section 4)
Overall size of the market, in population terms and relative spending power		Recommendation 1
Growth potential of the market, in terms of demand for broadband-services		
Efficiency of the markets in terms of fair competitive conditions		Recommendations 1 and 3
A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up		Recommendation 2

 - Good /  - Medium /  - Poor









The issues raised by respondents that most contribute to broadband investment risk in Kyrgyz Republic are shown below.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

Survey results – Kyrgyz Republic

The priorities for investors are summarised below, together with references to the relevant recommendations for reducing broadband investment risks given in section 4 of this report.

Investment risk factors	Kyrgyz Republic	Recommendations for reducing broadband investment risks (See section 4)
Corruption generally or in any aspect of operations.		
Certainty in construction permits and wayleaves.		Recommendation 4
State participation in the sector.		Recommendation 5
State assistance and funding schemes		Recommendation 6
.Legal and regulatory framework specific to electronic communications and broadband		Recommendation 3
Access to spectrum resources		Recommendation 9
Taxation generally or targeted at the sector.		Recommendation 8
Availability of labour especially with digital skills		Recommendation 7

 High priority  Medium priority

MONGOLIA

At a glance

Headline market statistics - Mongolia	2016	current
Population (millions)	3.1	3.3
Fixed broadband penetration per 100 population	7.4	9.4
Mobile broadband penetration per 100 population	74	105
Internet usage (% of population)	22%	63%
Forecast overall broadband market growth up to 2023 (% compound growth per annum)	1.6%	

[Sources: UN, ITU, Fitch Solutions]

Mongolia has a relatively small population with well above average penetration of mobile broadband penetration. The broadband market is forecast to grow at only 1.6% per annum up until 2025, which is well below the average for the Central Asian countries surveyed.

Survey results

Mongolia	Rating	Central Asia sample average	Central Asia sample Ranking
Broadband Market Attractiveness Index/100	62	53	1 st
Broadband Investment Risk Index/100	54	48	1 st
Best Practice Index/100	43	36	1 st
Overall Broadband Investment Index/100	53	46	1 st

In general, an index above 50/100 indicates a relatively a good market for broadband investments.

The survey results show that Mongolia is perceived overall to be the best market for overall broadband investment risk ahead of Kyrgyz Republic and Tajikistan. The overall market is relatively small, but with reasonable mobile and mobile broadband growth, estimated at 1.3% and 4.1% respectively per annum up to 2025. The legal and regulatory framework has not yet adopted best practices for competitive broadband markets, particularly with respect to licensing and for obtaining permits for broadband infrastructures.

What respondents are saying about the market

Market size and potential

"The market has grown quickly over the last five years."

"Growth is coming from both fixed and mobile broadband, in volume and revenue terms."

"With 3.3m population and high penetration, many people already have two mobile subscriptions."

"The broadband and international markets in the capital city have been good cherry-picking investments, so during the last two years we are investing in 4G in rural areas."

"The market is in very good shape long term. The younger generation is at a higher level of awareness, the future market will grow."

"Business growth has been very strong, following our five-year strategy and network development plan."

"We expect content quality to improve. Advertising revenue is shifting into social media."

"Covid has increased revenues significantly, mainly through greater sales of applications. Business has been impacted positively by Covid."

"The telecommunications sector is bright. Covid and post-Covid pace is very fast. eCommerce is strong."

"Infrastructure for the Soum centres (districts outside the capital Ulaanbaatar) are almost completed."

"The investments have removed countryside bottlenecks over the last five years, with very significant increases in data traffic."

"State-owned and private companies have already invested in fibre optic networks and have now connected most villages. The focus now is to increase coverage to the remaining smaller villages."

"International transit traffic has also increased dramatically over the last five years."

"Sector income is growing with the added capacity."

"Network investments have shown significant growth and success."

"Mongolia is a small market with four mobile operators and there is currently a clear demarcation between fixed and mobile companies."

"The top two mobile companies account for 85% market share. One of the smaller companies is planning to enter the fixed broadband market and this will restart competition."

"There are only two players in the PayTV market – the government issues licences – the market is saturated and so a new entrant would be hard to get business."

"For TV, domestic content is promoted and foreign content is restricted."

"We already have 2G, 3G and 4G and maybe 5G starting in 2022. Voice over IP services will start in 2022 and 2G will start to decline."

"There are many small places relatively unserved, including border towns - they all want broadband but it is not profitable."

"The possible fifth operator could be an MVNO using existing infrastructure, or maybe an MNO with their own infrastructure. But there is no space for a new entrant and no new cell sites anyway."

"In this market, if a new operator enters, we cannot be sure how it will succeed, it may depend on 5G."

"Given the 5G future, services will be driven by people's imagination - maybe it sounds like propaganda, but the argument is not unlike the 4G story – it's all about coverage and connectivity."

"We are not sure how 5G affect the market, we already have 4G but the up to now the government has been waiting for the policy on spectrum to be decided in 2023."

"But now government is now changing policy again, they want to start 5G in 2022. one year faster."

"We are assuming preparation and testing of 5G in 2022 and market roll-out in 2023."

"We now look ahead to 5G implementation so we are talking to the government and the regulator, emphasising that we have to base our investment decisions on economics."

"Our investments in 3G started 9 years ago and 4G started 5 years ago. We do not expect to reach our target returns on these investments until 2025."

"Now the government is rushing in 5G so we are in the shadow right now, where existing investment returns are not yet achieved."

"Two sectors, mining and telecommunications, have survived Covid in profit, we have healthy margins and our sector is in good shape."

"If 5G is added, the total investment will be huge, so we will have to talk to funders."

"Mongolia is not ready for 5G unless we go towards Internet of Things. The business model is not there for telecoms."

"The 4G market is not yet there, and 5G is a huge investment."

"4G services are now almost everywhere and there are plans to release spectrum for 5G."

"Is Mongolia ready for 5G? The level of investment is large."

"Technology development is attractive but in terms of business, 5G is still too early."

"The state-owned companies could make big investments but they don't have an established quota from the state budget so they have to justify investments every year."

"Commercial funding is another problem; the banks have a high interest rate so it's not affordable. It's tough for us to implement commercial projects so that's why we focus on government projects from the yearly budget."

Current market conditions

"There is 2G, 3G and 4G coverage, but with some places having only one provider and there is no national roaming."

"Digital infrastructure is now very good in Mongolia; we invested and have seen digital services grow – also we have been able to cope with the Covid surge in demand."

"Covid has provided leverage to increase coverage and capacity, so we have more investment and also planning investments for 5G".

"Currently, inflation is a challenge for us. Petrol prices are rising and there is the Covid impact on people and businesses."

"Most base stations are still connected by microwave links; fibre is very capital intensive."

"For some very remote sites, there are satellite connections."

"Some customers complain that 4G is too good, faster and more expensive than their needs!"

"Starting this year, the mobile companies are charging on a pay-by-usage basis because data usage has increased exponentially – this will mean that fixed broadband services will become cheaper."

"Full coverage, together with 5G will require spending over 4 to 5 years and with a 5th carrier, this could be problematic."

"Mongolia struggles with strict conditions but the market is exploding faster than predicted with people using more internet and higher speed broadband."

"The state-owned ICNC network company own the main network and state-owned Mongolia Telecom connects to customers."

"In line with government strategy, the state-owned infrastructures are open access for high quality internet and broadband services with high levels of security."

"Other players, including mobile companies and internet service providers invest alongside the state-owned networks and also use ICNC and Mongolia Telecom capacity on a wholesale basis."

"Mongolia is investing in fibre and NGN technologies giving network cost reductions and better internet, TV and broadband services, including fibre to the home and increased international connectivity."

"The city centre part has better connectivity for mobile and fixed broadband. But elsewhere, service is restricted - mobile broadband is available but it is expensive."

"To achieve connection with fibre to every household, the state-owned companies expand in parallel and in cooperation with the other companies."

"There are active retail and wholesale capacity markets, both focussing on a national broadband strategy."

"The Mongolian context has a large number of apartment buildings plus urban sprawl."

"There is little connectivity to key areas, the network is not completed, we are doing it piecemeal."

"The way we chose investment projects is to prioritise the households with school age children, but we cannot achieve all households in any year so we are doing it gradually."

"Mongolia terrain is very open and there are not many high buildings, 4G took only one year to cover most areas."

"There is wholesale sharing of international and national capacity including towers."

"The state companies provide traffic capacity and the private companies pay for using it, so this money is used for further investments."

"There is also a focus on rural countryside maintenance, plus the connection of additional areas."

"For the national wholesale market, 50% of customers are the largest telcos, the remainder is mainly for the Ministry of Education and other Ministries, plus the ICT companies."

"The smaller ISPs are decreasing because the bigger companies are expanding, so competition in the market is eroded."

The overall strategy for the sector

"The new Prime Minister is a great supporter of digitalisation -eMongolia. We held a very big "Digital Nation" exhibition."

"The government has a 15-year strategy covering mining, logistics and telecommunications and the government wants to promote innovation."

"Telecommunications is supposed to be the main innovation sector – but we don't have the proper business model yet."

"A new Ministry for Digitisation is being created with responsibility for innovation, data security, cyber security, eCommerce, eGovernment, IPR enforcement, with links to the Ministry of science and technology."

"The new Ministry will give priority to digitalisation, better coordination with other sectors and a stronger influence on the Cabinet of Ministers."

"The government thinks 5G will be necessary to develop the digital economy, for example 5G can solve automation of the logistics sector."

"Any change of policy is a combination of financial issues leveraged by Covid. To accelerate their popularity, the government will heavily push 4G expansion and home broadband expansion."

"Suburban areas include up to two million people with insufficient water, gas and broadband. The government will push to implement more infrastructure."

"Everything is changing – there will be a new Ministry mainly focussing on eGovernment"

"The near-term priorities are fibre to every house, eGovernment and ICT security."

"The eGovernment strategy has both the Ministries and the private companies involved in the core and access networks."

"5G is a policy for 2023 and there are plans for trials, perhaps with a new operator."

"For the proposed 5G trials, there is a 5th operator coming up – it's not clear if this is a new operator or not, or just an old basic voice operator restated."

"With government's 5G policies are not yet modified officially, but once they start talking about changing, it could happen quickly so we will have to reconsider our investment plans again."

"Private investment mostly focusses on the main centres and also participates in government programmes to connect rural areas and schools."

"The situation on privatisation is still unclear. In the power sector the policy towards privatising was reversed."

"The private companies want to have shares in the state telecommunications companies."

"Of course the Mongolian government is struggling with financial control, the level of debt and our bond repayments."

"The government will not privatise more than 35% of the state assets in the sector."

"The state companies provide national infrastructure for the private companies and are therefore already part of the private sector ecosystem."

"The state assets have to be used by the sector players on a fair and non-discriminatory basis."

"5G spectrum will be same as 4G because it is questionable that the market will involve non-telecom operators. The market is small."

"5G will change the licensing regime, for example Internet of Things licensing, self-drive car licensing, there will be big changes."

"There is a proposal for a "green data centre" project."

There has been good growth in broadband demand and supply, with investments in 3G and 4G mobile coverage and fixed broadband networks, including some fibre connectivity in the main population centres plus fibre routes in main transmission network. Penetration of mobile broadband is already very high, with many users owning two Sim cards. Fixed broadband penetration is the highest in the Central Asian countries surveyed, but still relatively low by European standards.

The sector faces some significant challenges, including the expansion of broadband connectivity to low population areas, new challenges in spectrum management, the role and timing of 5G roll-out and the regulation of a market changing fast from separate services to converged high-speed and multi-media broadband.

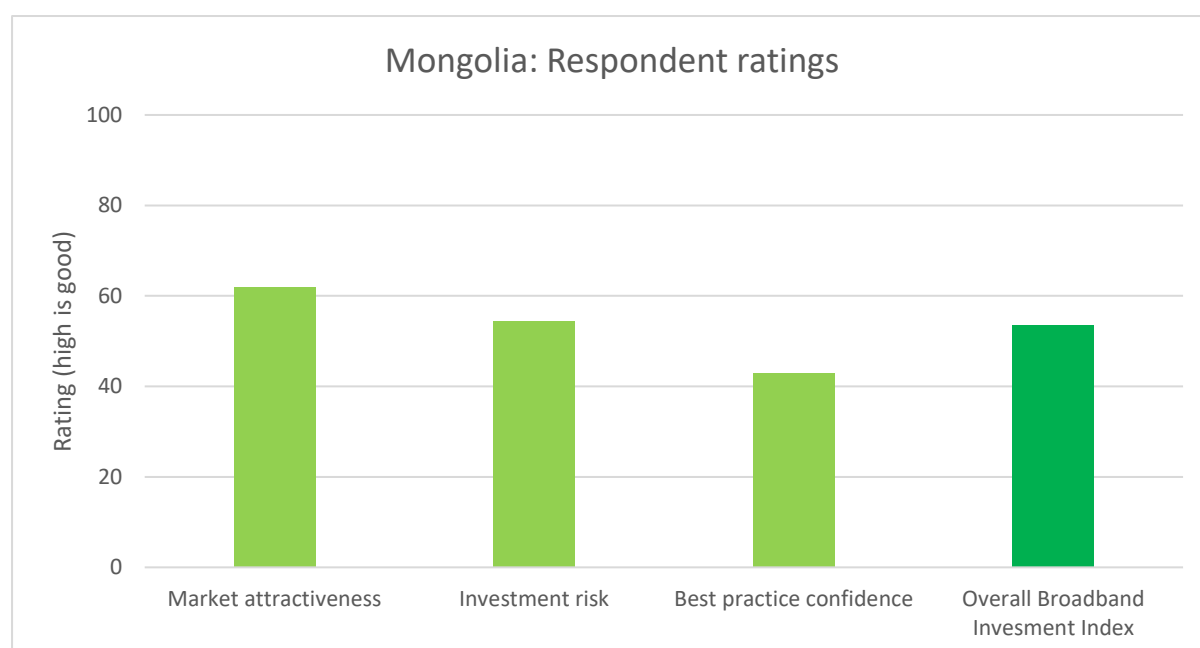
Survey results – Mongolia

Another key challenge raised by the survey respondents in Mongolia has arisen from the COVID-19 experience. This concerns the education of children cut off by the pandemic who could be better connected to schooling via broadband. Mongolia already has some provision for free broadband to households with children and the respondents continued to see expansion of connectivity and further broadband provision in this priority area.

In 2020, the Mongolian government set out its five-year mission to build a ‘digital nation’, harnessing data and technology to facilitate innovation, streamline public services and diversify Mongolia’s mining-reliant economy. As well as providing a demand stimulus for broadband services, the e-Mongolia initiative has already been particularly valuable in the response to the COVID-19 pandemic. Further details are given in the Annex to this report.

To ensure coordination of sector issues, a new ‘Digital Ministry’ is proposed to be set up, dealing with the ICT sector. It will have a national digitalisation strategy as a priority, making sure that other Ministries are coordinated, in order to set out a coherent case to the Cabinet of Ministers for the medium term. For example, the logistics, transportation and mining sectors should fully benefit from the benefits of digitalisation in their mission critical functions. The role of 5G and its role in the emerging ‘Internet of Things’ has already been recognised. For the new Digital Ministry and the sector regulator, the task will be to ensure that broadband infrastructure (from state-owned entities and the private sector) expands to meet the whole country’s needs under market conditions that are enabling to investments. The existing impediments to investment identified in this survey in the section below provide the immediate priority areas for reform. Recommendations in each priority area are provided in section 4 of this report based on best sector practices in mature broadband markets.

In the new era of digitalisation, other issues such as cyber security and resilience of critical network infrastructure have come to the fore during the COVID-19 pandemic but have not been identified for Mongolia as immediate priorities. Indeed the network and the broadband sector as a whole has, in the opinion of the respondents, coped remarkably well during the pandemic. The telecommunications related issues arising generally from the COVID-19 experience are further considered in the Annex to this report.



The overall Broadband Investment Index (right hand pillar) is calculated from the three indexes represented by the first three pillars. The full calculation methodology is given in section 2 of this report. For each pillar, the higher the score, the better the conditions are.

Mongolia has a reasonable score for market attractiveness with its further investment and growth opportunities. Investment risk is judged to be lower compared to the other Central Asian countries surveyed. However, there is a relatively low level of confidence in adopting best practices for broadband sector policy

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and regulation. The overall risk is considered reasonable, as measured by the broadband investment risk index.

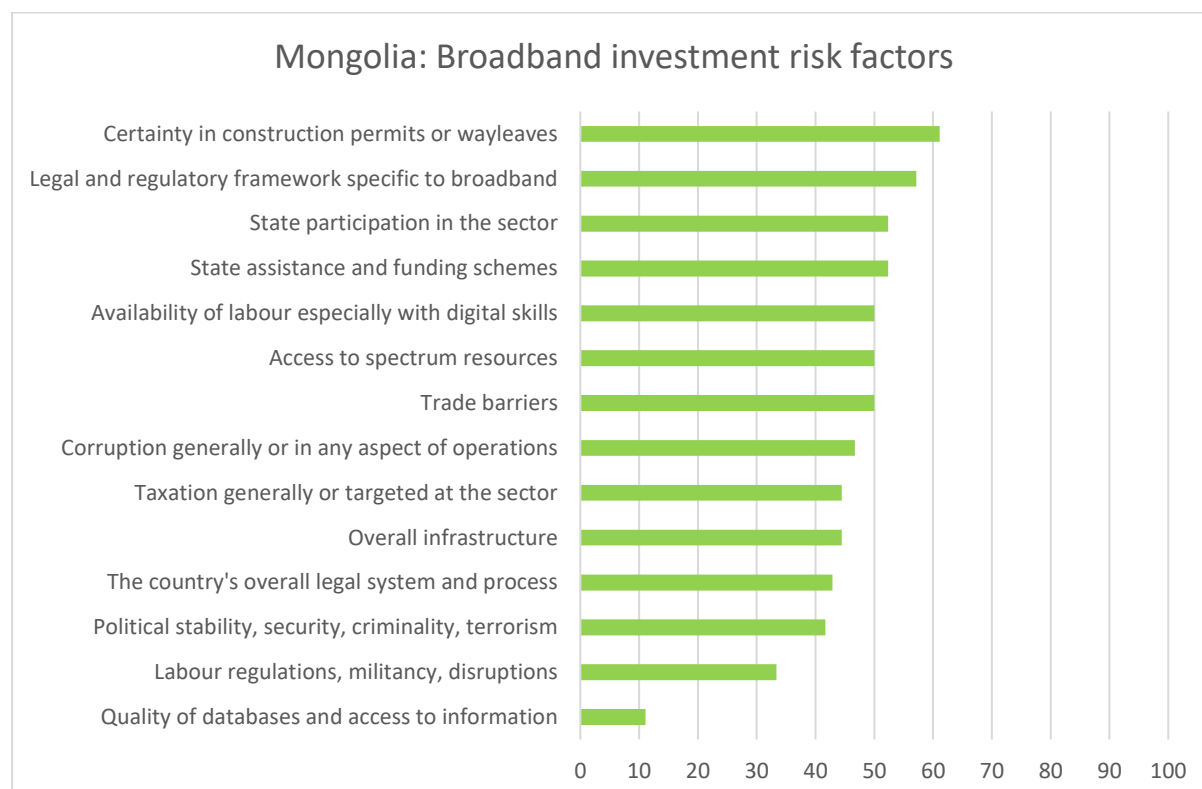
More detail regarding the main investor concerns is given in their comments below.

Respondent views

The survey considered 14 factors related to investment in ICT infrastructure. A description of these factors is given in section 2 of this report. Respondents were asked to express their view on whether the conditions for investment are affected by each factor in any of the following ways:

- Positively encourages investment
- Does not deter investment
- Mildly deters investment
- Strongly deters investment
- No opinion.

By assigning relative scores normalised to a scale of zero to 100, each factor has been ranked in terms of how much it contributes to investment risk.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

Respondents perceive that there are several priority areas of concern that slow down or inhibit investments in broadband infrastructure and services. Uncertainties in obtaining construction permits are expressed as a relatively high barrier to investments.

Parallel concerns arise from the legal and regulatory framework, with its complicated licensing regime and lack of investment promoting measures. The state's role in ownership of both main infrastructure and fixed line access networks is not judged to work well alongside the private sector players that rely to a significant extent on the efficiency of these state entities. Equally, the current role and disbursement of the state funds collected from operators for universal service is seen as unsuitable for the prime purpose of increasing broadband coverage and connectivity.

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Other factors contributing to investment uncertainties are the current spectrum management process, the need for a workforce with better digital skills and the over reliance on equipment supply from China.

The following comments give more details of the specific concerns of investors.

Granting of permits**How respondents expressed views about permissions and wayleaves in Mongolia**

“There are many problems in the capital city and other populated areas. We have to deal with permissions in many different ways, not legal ways sometimes.”

“In rural areas there is also a problem. It is not regulated clearly and property owners have different agendas. This delays our investment 3-6 months.”

“The process of approval is long, it’s often a black hole.”

“There are so many problems in the access network, especially in the Ger districts²⁰ where getting access to land and poles is difficult and expensive.”

“The land is not free, this is a city management issue, ownership is in the power of the Ger, purchasing the land is very hard and we need changes in the land law.”

“Building in a Ger district is difficult, getting permission is hard.”

“There are cost difficulties arising from the bad management of Ger districts.”

“It is difficult to use the lighting and electricity poles because the utility companies say that they don’t want heavy cables on their structures.”

“The difficulties mean that we have to build our own independent infrastructure, which is expensive.”

“The problems are giving rise to a digital divide because in some areas it is too costly to provide fixed broadband.”

“Land law is changing; we are expecting improvements to remove the problems involved with obtaining permissions.”

“The association of operating companies will be focussing on this common issue, to drive changes in the law.”

“The new Digital Ministry will take control of this issue because they realise that it is very costly to bring broadband to some areas.”

“This issue also affects the power companies.”

“We are expecting improvements from new regulations, but they are still not in force.”

“The operator association research has looked into the rights of way challenges and is proposing better policies and guidelines.”

“We must seek the right solution; the regulator has said it will focus on this issue but it is really a hard job and nobody wants to do it.”

This is a widespread problem, encountered by all broadband providers, especially those wanting to connect fixed broadband to private properties, where demand is strong. There does not seem to be a single process

²⁰ A Ger district is a form of residential district in Mongolian settlements. They usually consist of parcels with one or more detached houses or Gers, surrounded by two-metre-high wooden fences. In some other countries, Gers are known as yurts.

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for obtaining permits and it is left to individual companies to seek solutions with a number of different parties without any consistency or legal backing.

Best-practice experience in the strengthening of the legal basis and the streamlining of procedures for obtaining permits is given in Recommendation 3 in section 4 of this report).

The legal and regulatory framework for broadband**How respondents expressed their views on the legal and regulatory framework for broadband in Mongolia**

“Although the legal framework provides an attractive background, the companies act according to their own interpretation - people's understanding is different.”

“The law has remained the same for the last six years, however the challenge is how to comply with it?”

“There are many legal disputes. Often these will be amongst the operators and also against the government.”

“If the sector companies have a problem, then it is discussed with the regulator, they make changes, the companies want to act quickly to the changing data market.”

Licensing of operators

“Everything is complicated in Mongolia. We have an unusual history of separate licences.”

“For example, if an operator wanted to go into the IP transit business, which is growing dramatically, it would need another licence and this will take 3 years to complete the process.”

“How licensing is being applied in real life, it's very complicated.”

“Licensing is very complex – and for each type of licence you have to have a separate company.”

“The existing licensing regime is run by the regulator as a government agency – it is influenced by politics.”

“The good thing is that it prevents one entity from owning everything.”

“With the market changing and new companies entering, the licensing system has new challenges.”

“At the moment there is licensing separation, a mobile company cannot have an internet service or fibre broadband because that is a separate licence and needs a separate company.”

“We are forced to have separate companies, it is complicated - we suggested a unified licence but nothing has changed,”

“We offer multi-play - five different services in a bundle, to give us a competitive edge. We have to do this with five different companies.”

“Licensing should basically be easy – an on-line process, but the regulator still has to be organised for this.”

“Mongolia Telecom has a special permit from the regulator to enable transit fibre optic connections via China and Russia, then the other operators can connect at the border.”

“A mobile company needs a separate licence to lease fibre for main and local connectivity. We get service from local providers for the last mile.”

"They say they will liberalise licensing but we will still be left with different categories of licence – for content, for networks and services, so we will still need separate companies."

"Maybe there will be a new type of licence for voice and broadband, an ICT licence."

"The changes to the licensing regime are largely undecided."

Market regulations

"The dominant operator is regulated for wholesale access to their duct networks."

"There is price regulation on the largest internet service provider, based on cost orientation."

"Local networks have no price regulation."

"There is a need to reduce the margins on state-owned company wholesale tariffs."

"There are good relations among private companies – they can agree network deals amongst themselves."

"If you built your own network before 2013 then you still use that. After 2013 they passed a 'no duplication' law and we had to use the government network. The process was liberalised in 2018 but there are remaining restrictions, so we still have to plan alternative transmission routes that do not directly duplicate."

"The current situation is not effective; we still have to use the expensive state-owned network but we fight against it and try to get round the regulation by building by-pass networks on different routes."

"If you don't have your own network you can pay up to 25% of your monthly income in transmission fees."

"The state-owned ICNC is automatically a monopoly company and the wholesale prices paid are too high so private companies have to rely on their own infrastructure."

"Private companies cannot get sufficient margin or enough quality by using the ICNC infrastructure."

"The private companies now have their own transmission so they can fix their prices commercially and the margin comes automatically."

"The government should reduce the state-owned network wholesale price for reaching rural areas - this would make investment easier."

"If the government can reduce their wholesale charges there would be a revolution in Mongolian telecommunications."

The state-owned network has a mission to make a margin – they should be a non-profit making entity."

"We are not sure what regulatory input there is to the calculation of the ICNC wholesale price. This is not transparent."

"For ten years we have fought for lower wholesale charges but we are ignored."

"The state-owned companies are part of a wild competitive market, where the government tried to push down the price, but Mongolia Telecom has to be commercial."

"The price cap regulation has been removed for wholesale duct access and internet capacity, now there is a system of package pricing, based on cost orientation."

"The new number range allocation was done in contravention of the existing regulation - so it was referred to the regulator and eventually it went to court and now is at the supreme court. This has so far taken eighteen months."

“Regulation is firm and often the operators work together against the regulatory committees.”

“There are hidden connections – lobbying, for example on new numbering allocations.”

“The regulator does an analysis of the market twice or three times a year and reviews the regulations.”

“If some companies bring cases to the competition agency, then price regulations are reviewed.”

“For regulated services, there are licence obligations setting minimum and maximum tariffs, based on cost-plus regulatory formulae.”

“For wholesale services there are separate maximum tariffs and guarantees of a level playing field.”

“For any monopoly services there are extra regulations and stricter minimum and maximum tariffs apply.”

“For retail markets there is no case for monopolies, but in wholesale markets the monopoly regulations apply.”

Infrastructure access and sharing

“On towers and fibre transmission, the operators rent from each other, so typically to have geographical coverage from 1,000 towers, an operator would build 200 towers then rent space on the 800 towers from the other operators,”

“On sharing, the regulator is not involved in setting charges.”

“According to law we cannot duplicate fibres in the same position.”

“There have been problems with Interconnection agreements – if an existing agreement is disputed then payments under the agreement cease and revenue stops.”

“The charges are agreed between the operators, but the negotiating positions vary according to interpretations of the law.”

“In practice there is mutual cooperation whenever an operator goes there first and installs a new tower. Then the other operators rent it. There are no regulated prices for this.”

“Only if we cannot agree does the regulator get involved.”

“Even though we compete, when it comes to technical matters, we can cooperate easily.”

“There are no joint investment cases across sectors – the State mining companies are talking about digital, but there are not yet any proposals to set up joint ventures,”

“All vertical players need to understand joint investments in ICT, even though they invest currently in their own infrastructures.”

“The one most important thing to change in the Mongolian telecommunications sector is to share infrastructure, it's not difficult technically but it is still resisted competitively.”

“We need to start working groups on infrastructure sharing to find out why it is still resisted and how to make it workable.”

“A good role for government is to encourage infrastructure sharing.”

“A possible fifth operator would be a nightmare – they would probably want to use the existing base stations, but the towers are all full up!”

“We see 5G as more collaborative across sectors. We have to share infrastructure – towers.”

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The survey respondents expressed a number of concerns about the legal and regulatory framework for the sector that make it unsuitable for the expanding broadband market. In their view, the legal and regulatory framework needs updating to be more liberalised and encouraging to broadband infrastructure investments and growth in services. This reform is needed to ensure the required digital connectivity for all sectors of the economy and to all households and settlements.

Although the market is competitive and private companies are allowed to make commercial investment decisions, there are a number of factors in the current market that slow down or reduce investments, leaving some broadband demand unmet or making services more expensive than they need to be.

The main factors in the Mongolian legal and regulatory framework and implementation that hinder investments are:

- The restrictive licensing regime that restricts companies to single services, against the market and technological trends towards digital services convergence.
- The apparent lack of transparency and justification for the perceived high charges for wholesale digital network capacity provided by state-owned entities with significant market power.
- The existence of regulation to avoid “inefficient duplication²¹”, which is perceived as favouring the use of existing state-owned infrastructure. Although this regulation should encourage infrastructure sharing and cost reduction, in practice it can limit investment choices and distort investment decisions by the private sector.
- The insufficient implementation of investment promotion measures for broadband infrastructure, including cost-reduction measures involving other infrastructure sectors including joint construction, joint use and coordination of civil works.

If the operational and commercial relationships between the different operators are left entirely to the market players to sort out, then investment and other market decisions will often be distorted by the differences in relative market power between the various players. New entrants will tend to be dominated by incumbents. To avoid the resulting market distortions in investment decision-making and competitive market efficiency, there will be a need for specific regulatory measures, for example:

- An obligation on the players with significant market power in the relevant wholesale market to offer services on an open and non-discriminatory basis to any operator requesting capacity.
- The regulation of the wholesale charge made by the player with significant market power in the relevant wholesale market. The regulation of wholesale charges normally makes reference to relevant best-practice (modern technology) costs of the capacity plus a fair rate of return, or in the absence of reliable cost information, the wholesale charges are set with reference to the end-user tariffs in the downstream retail broadband market (retail minus regulation). This second approach seeks to avoid ‘margin squeeze’ behaviour by the more dominant operator.

In Mongolia, state-owned networks (providing main network capacity and fixed access networks) have operated alongside private sector players (notably the four mobile operators and numerous internet service providers) for many years. The system of regulation of interconnection and wholesale capacity charging has evolved over that period. This has already achieved a very high penetration of mobile broadband services and a growing fixed broadband market. In the view of the survey respondents, the current legal and regulatory framework has led to investment distortions that still result in lower penetration of broadband in rural areas and to higher than necessary broadband service tariffs. The respondents have expressed the need for an updating of the sector’s legal and regulatory framework to meet the future investment challenges for the full digitalisation of the economy alongside emerging technologies (such as 5G and full fibre access), plus the higher expectations of businesses and consumers and the significant growth in broadband connectivity and speeds.

The additional and connected factors of difficulties in granting permits for new infrastructure, the role of state-owned networks and the use of state subsidies, plus the lack of certainty in spectrum management

²¹ <https://crc.gov.mn/en/k/2IW> see paragraph 5.3

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have also been raised by survey respondents. These related issues are discussed in other parts of this section.

Further details of best practices in ensuring that the legal and regulatory framework fully supports broadband infrastructure investments including infrastructure access and sharing are included in Recommendation 3 in section 4 of this report.

State participation in the sector**How respondents expressed views about state participation and funding in the ICT sector of Mongolia**

“Mongolia Telecom is the former incumbent; it was privatised earlier but has now reverted to 95% government ownership.”

“ICNC (Netco) is state-owned and charges high wholesale rates to the private companies for use of their main transmission network.”

“The state-owned Mongolia Railway company has a telecommunications network but it does not yet rent out its network to other operators. They currently have different priorities – railway communications, not public broadband service.”

“The high costs faced by private companies to use the state-owned networks can only be resolved by privatisation or better regulatory intervention.”

“There have been previous state programmes including the Soum wireless connection initiative, using a contribution from all operators as a percentage of their revenues defined in the law.”

“There are two state-funded ways to increase broadband connectivity, firstly for the really remote and expensive areas, where operators can bid to receive state subsidies for investments. Then the second area is a separate state budget for the state-owned companies to invest in open infrastructure.”

“Licensed ICT sector players have to contribute 3% of profits towards the state fund for remote areas.”

“The use of the state fund is a hot topic – private company investments are a private matter under the law, but if private companies are awarded projects for network expansion, they have to invest in specific ways and there is insufficient transparency about the actual investment.”

“The 3% levy is charged on company profits after tax and dividends.”

“If a company contributes to the levy, they can benefit by participating in the tenders. The state fund selects a village and if an operator wants to expand there, they participate, but some of the expenditure is still borne by the operator.”

“Every now and then the government releases a tender for companies to connect unserved areas with broadband, the companies that won were the ones with existing 2G infrastructure.”

“The fund offers a fixed sum of money paid on a quarterly basis subject to audit, but the winning bidder has to invest first.”

“These schemes are in the past now, the last one was three years ago. Maybe the next one will be when there is an election.”

“We have quite a lot of discussion with the Ministry of Finance, the Telecommunications Ministry and the regulatory agency, but the issues relating to the use of the state fund have not been resolved.”

"The % tax on operators is used by the state to help pay for infrastructure in places where the operators would otherwise not invest because it is not profitable."

"The government collects the tax every year and the regulator then look at the number of children in high school in each geographical location to decide on priorities for investments."

"On-line schooling is having a big impact on the Mongolian market. There is no sign of increased government support. If each household has one device and you have three children, then you need more devices."

"Companies will have to manage this and the service quality. There is no government support. There are lots of free services to support society - we deliver TV content free and e-learning content where we give a free allowance every month."

"On-line schooling is free. Education is mandatory."

"Because there is political impact, the parliamentary members send official requests to get to their elected provinces connected fully."

"The regulator does the research, chooses the locations and announces the tenders, then selects the most compatible bids to install the new infrastructure, on a technologically neutral basis."

"So far 325 villages have been connected in this way and we also do this for the herder communities, setting the geographical area by how many people will be able to get the internet."

"We don't know how the government projects are selected. Sometimes there is already 2G and 3G services but they still select these areas, it is not transparent."

"The government identifies target areas. Some areas we already have 50% coverage and some areas we have 0% - it is only worth bidding in the 0% case otherwise our services will have to compete."

"We may not be able to tender if we are blacklisted for complaining too much."

"Being state-owned, Mongolia Telecom supports the implementation of the government's priority areas of its strategy document."

"The government's 2022 - 2024 action plan expands infrastructure and connectivity."

"The education sector is in crisis following the Covid outbreak so this is now the priority."

"For households that have children, there is a free connection scheme for two years."

"The Government sector budgets are sometimes hard to retain, the government has so many projects."

"For the state-owned companies, there is a conflict between profit and state, commercial versus social responsibility."

"This state versus profit debate has been highlighted by the Covid situation, giving rise to increased demand for government services - particularly education, alongside the normal commercial demand for more and better broadband services."

"There is some funding from government but at the moment there is no system of defined subsidies."

"It is often slow working with government – the state property agency is also sometimes involved in investment decisions."

"The use of the state budget is proposed by the sector on a commercial investment basis, then they decide if we get the money."

"The government decided to decrease the consumer price in the countryside areas."

“For the countryside areas, the government decides with the state company what kind of projects to invest in, which base stations and towers.”

The state owns significant network assets, including the main transmission provider ICNC (‘Netco’) and the local access network provider Mongolia Telecom. The regulations stipulate that these assets are open for use on a non-discriminatory basis by any operator with the relevant licence. The mobile operators and internet service providers can rent capacity from these state-owned networks to link their main sites, for example the mobile base stations, or in the case of internet service and other fixed line service providers, to connect directly to households and business premises.

A relevant legal provision protects the monopoly power of the ICNC and MT incumbent networks by prohibiting duplication of infrastructure – that is, if a network element already exists on a route (which from its monopoly era incumbency tends to be an ICNC or MT network element) then another operator cannot construct a new network element alongside it. This tends to result in two sub-optimal outcomes, in terms of competitive and economic efficiency:

- Operators considering broadband network and service expansion only have a single provider from whom to rent capacity (ICNC or MT depending on whether the location is in the main transmission network or the local access network). Unless the charges for this wholesale rental of capacity are regulated using a fair and transparent cost-related calculation, ICNC and MT charges will tend to be higher than a modern cost-efficient network. The respondents to the survey also mentioned that the quality of the networks is not what should be expected from best practice broadband technology.
- If the operator decides to expand its own infrastructure, then to avoid the ‘duplication law’, it may have to construct along sub-optimal routes, making the resulting transmission network more expensive than it would otherwise have to be. This issue was raised by several respondents.

The existence of state-owned networks alongside private investments has been the subject of many different regulatory approaches in different countries. Many countries have solved the problems caused by differences in objectives between public and private sector interests by privatising the state assets, leading to a more common set of commercial outcomes between the players. Other countries have left the market entirely to the private sector and have been disappointed by the ‘digital divide’ resulting from lack of commercial investment in low population areas and where costs are highest. In these cases, one option has been to reintroduce state-owned networks to provide open access and low-cost capacity to the less unprofitable and unprofitable areas, so that the private sector can serve markets that they do not plan to reach entirely with their own infrastructure

Whatever the resulting balance between the private and public networks and their relative market shares, there will generally be a need for clear and transparent regulation. This is covered in the section above relating to the survey findings on the legal and regulatory framework above.

The second factor relating to the state involvement in the sector in Mongolia relates to the use of state subsidies to assist in the expansion of broadband services out to unprofitable areas. This area also includes the current need for subsidised broadband services to priority sectors of the community, notably households with children whose education has been put at risk from COVID-19 isolation measures.

In Mongolia, the state-owned companies (ICNC and MT) are tasked with implementing government investment programmes using the state budget to ensure that all geographical areas of the country can receive broadband services. This has already been largely achieved for mobile broadband services, although there are still some very remote communities left unserved. The respondents have stated that there is a conflict of interest within both ICNC and MT between the need to invest in unprofitable areas and the government’s requirement that they need to make a commercial return.

The normal policy that governs this common situation in many countries are the so-called ‘universal service policy’ backed up by the use of a ‘universal service fund’ to achieve that policy. There are many ways in which this type of policy and fund have been used with different levels of success in achieving the objective of universality. In the broadband era, the methods of the past have now largely been abandoned and replaced by specific “broadband state-aid” measures to reflect the national needs of the modern digital society and economy.

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In Mongolia, there is already an established universal service fund, using a defined contribution from the operators. This fund is now being used to provide subsidies to operators (via a competitive bidding process) that agrees to build broadband infrastructure out to otherwise unprofitable areas. In this way, the available subsidy payment makes each investment viable. Each investment project and location are defined separately, using priorities set by the government. At the moment the priorities are influenced by the number of school age children in an unserved area.

In the view of the survey respondents, aspects of the prioritising and allocation process are not sufficiently transparent and could be subject to political or other distorting influences. There is also generally uncertainty about the future of the policy and the timing of each round of projects, leading to investment gaps. In the respondents' view, there is a need to re-examine and re-launch the universal broadband policies and state-aid process, taking account of sector views and best international practices.

Examples of best practices regarding the state involvement in the sector and the use of state aid for broadband expansion are given in Recommendations 5 and 9 in section 4 of this report.

Skill shortages

How respondents expressed views about obtaining skilled staff in Mongolia

"We use our own staff to work on cables and towers and when we outsource to private operators, they send their staff to have training with us."

"For working on a digital strategy there are resource problems, the private sector pays better than the state companies."

"The telecommunications sector is also competing for staff with the mining sector, where salaries are higher."

"We do not have satisfactory digital skills, we are understaffed."

"The Ministry of Education is responsible, but we also have our own new academy to retain our staff - we offer courses to other companies".

"Skills are not yet a barrier to investment – after one or two years maybe, but at the moment the local people are sufficient."

"Only 2% of graduates are in ICT and the number is decreasing."

"The shortage of skills has to be filled with foreign recruits."

"One of the aims of the new Digital Ministry should be to integrate digital efforts and to promote university level ICT training - but this is not very clear yet."

The views expressed by respondents on the availability of digital skills in Mongolia echo the views expressed in most other countries surveyed. The concerns cover not only the limited availability of skilled staff to work in broadband networks and service suppliers, but also in the skill levels of consumers and businesses which could limit future broadband usage and market growth. Further analysis on both the demand and supply side responses are given in Recommendation 7 in section 4 of this report.

Examples of best practices in tackling skills shortages in the ICT sector, see Recommendation 7 in section 4 of this report.

Spectrum issues

How respondents expressed views about the availability of spectrum in Mongolia

"Spectrum pricing is not so expensive as other countries - we don't think it is such a critical issue."

"Spectrum has an up-front charge but there is no yearly fee."

"The key issue is allocation - already the main spectrum is being used by existing mobile broadband and TV broadcasting, so if there are to be four or five 5G operators then there may be shortages."

"There is a policy initiating 5G in 2023 and now they want to change it to 2022."

"5G spectrum is not allocated and not yet approved, so it is very difficult to plan our investments."

"Previously, sufficient spectrum allocation was made to the mobile operators, there was no competition, just upgrades to existing allocations."

"There are no auctions, the companies that already have spectrum get more."

"In the regulation, they just divide the amount of spectrum by four and each mobile company gets the same - there is no spectrum pricing regulation."

"We have no choice in spectrum, maybe the government will try to make adjustments if they have a new entrant."

"It is unclear how they will they allocate future spectrum."

"Spectrum pricing is not resolved - the situation is so uncertain."

"5G is possible from 2023. It is too early to know."

"For 5G investments, the entry level spectrum price has to be as low as possible, otherwise we do not see the demand to justify our investments."

"The regulatory authority is still considering 5G. For existing spectrum awards, the process was ambiguous - depending on timing. So future 5G allocations remain uncertain."

"There was considerable opposition to the frequency award to a fifth operator, including a call from the Association of operators to withdraw the award, whereas the government and regulator still argue on the basis that expansion of 4G services is a good thing."

"Behind the scenes there is a lot happening, the allocation of spectrum to a fifth operator and two existing operators are already complaining to the courts."

"The question of 5G has started the debate about Radio Access Network sharing, but operators do not want to share networks."

"For the state companies, network sharing is easy because that is their business model."

"If 5G comes along there will be big changes, involving more sharing to make investment cases better."

"Many people believe that the spectrum is toxic to health so deploying Wifi services in apartment blocks or investing in new mobile base stations is difficult."

"People have little knowledge on the safety of spectrum-based services, the regulator carries out checks to reassure people so we hope that attitudes will change."

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"We currently have 2G plus 3G and 4G is in operation, maybe 5G in 2022. From 2025 to 2027 we will start eliminating 2G."

"We need to know when we can re-farm 2G. We are not required to use any specific technology, but it is all about cost."

"The 5G network will consume five times more electricity."

"In remote areas there is no competition. If we shut down the 2G network, there will be no coverage in some areas."

"For us 2G cannot just be turned off - most subscribers in rural areas are 2G. Two things are needed – more investment in 4G, which is expensive; and more smartphones, which will take time."

The survey respondents expressed their uncertainty about the government's forward plans for spectrum. The main issues are:

- The possible accelerated timescale for 5G, giving rise to significant new investments at a time when the existing investments in 3G and ongoing investments in 4G have not yet produced sufficient financial returns. Investments in 5G will therefore depend on the availability of funding.
- The possible entry of a new mobile operator into the market, increasing competition and weakening the case for the existing operators to invest.
- A general uncertainty around the procedures that the government will use for future spectrum allocations (especially 5G) and the possibility of the withdrawal of some spectrum, for example the frequencies currently used for 2G services.

The current experiences in many countries show significant uncertainties regarding 5G investments. Most policy makers (including the Mongolian government) recognise a clear enabling role for 5G in the digitalisation of national economies to bring future societal and economic benefits. At the same time however, many telecommunications operators remain unconvinced about the commercial case for investments in 5G infrastructure.

The level of new investment to achieve the full geographical and functional potential of 5G is generally forecast to be significantly greater than the telecommunications investments already made for 3G and 4G roll-out.²² To achieve the full benefits, whole sectors of the economy will exploit the greater connectivity and versatility of 5G. For this reason, it is generally understood that 5G roll-out will not just seen, like 3G and 4G before it, as largely an upgrade to telecommunications networks and services.

The new Ministry for Digital Development and Communications²³ is expected by the survey respondents to re-examine the role of mobile broadband as a contribution to the full digitalisation of the national economy. This reassessment will have to bring in the digitalisation objectives of all the main business and government sector activities. In the light of this fundamental review of the role of the mobile operators, the policies for spectrum management, including the key issues of spectrum allocation and pricing, need to be reassessed. New procedures, based on international best practices, will be required in order to ensure that Mongolia's finite spectrum resource is used optimally to achieve a new set of national and sector-by-sector digitalisation objectives.

The wider view, expressed by survey respondents in many countries, is that if nations are to take full advantage of the expected transformational benefits of 5G and its related applications, then spectrum management policies need to encourage greater investment participation, innovation and cooperation,

²² <https://www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/the-road-to-5g-the-inevitable-growth-of-infrastructure-cost>

²³ <https://mddc.gov.mn/en/the-ministry-of-digital-development-and-communications-has-started-its-activities/>

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taking account of the needs of a far wider range of interests than just the telecommunications sector (see also Recommendation 9 in section 4 of this report).

Other issues**How respondents express their views on other issues in Mongolia****Taxation issues**

“There is a specific tax on the sector for funding universal service at 3% of profit after tax.”

“There is also a 15% tax on fixed line Pay TV revenues which goes to the TV sector for local content providers.”

“The national TV stations get this 15% but operators can choose to pay more in order to ensure that the content copyright is protected.”

Trade issues

“All equipment is imported and there is no restriction – just a 5% customs tax.”

“The current problem is the transportation cost plus delays with the supply chain from China.”

“At the moment we have Chinese vendors - European and American equipment is too expensive.”

“We would like more vendor competition, if the French, German and American companies could push into our market this would be a wind of change.”

“With no real alternatives we get lower costs but lower quality – in the past we had the innovators – Alcatel and Siemens, they were the first to come to Mongolia.”

“If Western companies could get into the media, they could be in the news and create a good position.”

“The Indian suppliers are starting to create a market here; everyone is trying to get out of Chinese control of the supply.”

Overall infrastructure

“Electricity infrastructure is not really a barrier; all provinces have national grid now.”

“Transportation problems remain but the roads are better now than 20years ago.”





Sector taxation is considered further in Recommendation 8 in section 4 of this report.

Recommendations

The detailed recommendations in this report are given in section 4. There are two types of recommendations, the first type to improve the overall attractiveness of markets and the second type to reduce investment risks.

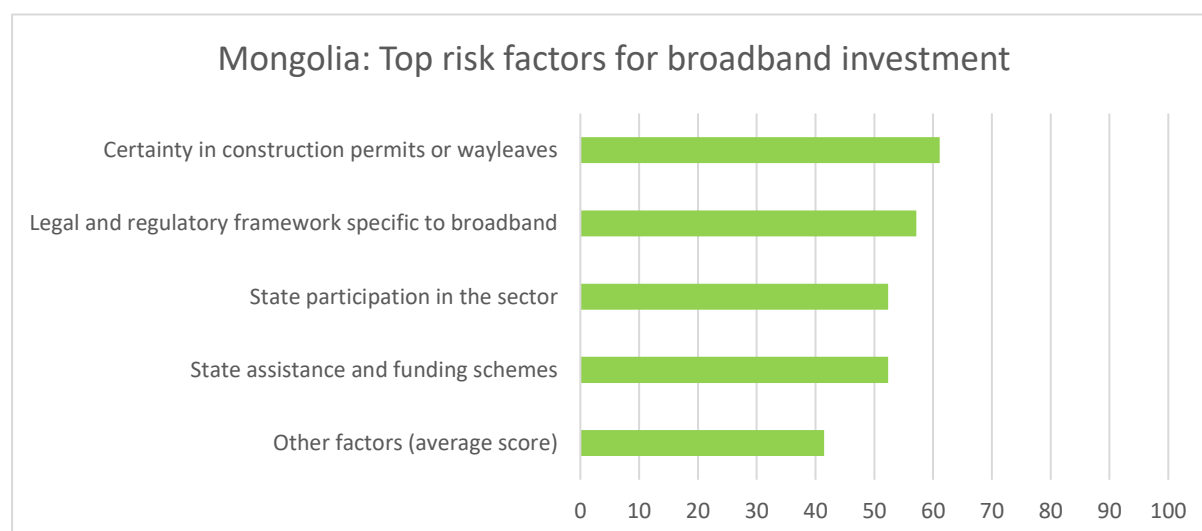
For Mongolia, the respondent views regarding market attractiveness are summarised below, together with the relevant recommendations for improving the overall attractiveness of the market.

Survey results – Mongolia

Market attractiveness factors	Mongolia	Recommendations for improving the overall attractiveness of the market (See section 4)
Overall size of the market, in population terms and relative spending power		Recommendation 1
Growth potential of the market, in terms of demand for broadband-services		
Efficiency of the markets in terms of fair competitive conditions		Recommendations 1 and 3
A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up		Recommendation 2








 - Good /  - Medium /  - Poor

The issues raised by respondents that most contribute to broadband investment risk in Mongolia are shown below.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

The priorities for investors are summarised below, together with references to the relevant recommendations for reducing broadband investment risks given in section 4 of this report.

Investment risk factors	Mongolia	Recommendations for reducing broadband investment risks (See section 4)
Certainty in construction permits and wayleaves.		Recommendation 4
Legal and regulatory framework specific to electronic communications and broadband		Recommendation 3
State participation in the sector.		Recommendation 5
State assistance and funding schemes		Recommendation 6
Availability of labour especially with digital skills		Recommendation 7
Access to spectrum resources		Recommendation 9
Trade barriers		

 High priority  Medium priority

It is recommended that for any changes to government policies, to the legal and regulatory framework or to working practices for the sector, which could impact the investment decision-making of sector participants, should be fully consulted with stakeholders before being passed. Based on the views of the survey respondents, this is especially relevant in Mongolia because:

- The current legal and regulatory framework is open to different interpretations in its practical implementation, especially with regard to the unsuitability of the current licensing regime to modern digital markets and also regarding the lack of justification and transparency in wholesale capacity charging.
- A lack of consistency and legal support for the process of obtaining permits to put in place new physical infrastructures.
- The lack of transparency and consistency in the use of state fund subsidies to support broadband investments into unprofitable areas of the country.
- The market distortions arising from the existence of state-owned incumbent telecommunications entities alongside the newer private sector entities.
- The investment uncertainties arising from spectrum management policies and procedures, especially in respect to the timing, allocation and pricing of 5G spectrum.

Detailed recommendations on these and other issues arising from the survey are given in section 4 of this report.

TAJIKISTAN

At a glance

Headline market statistics - Tajikistan	2016 report	current
Population (millions)	8.5	9.5
Fixed broadband penetration per 100 population	0.7	2.2
Mobile broadband penetration per 100 population	12	51
Internet usage (% of population)	15%	35%
Forecast overall broadband market growth up to 2024 (% compound growth per annum)	14.7%	

[Sources: UN, ITU, Fitch Solutions]

Tajikistan has the largest population of the Central Asian countries surveyed. Mobile broadband penetration remains low in comparison to the other countries in the region. Fixed broadband penetration is very low. The growth in mobile broadband subscriptions is forecast to be very high at 15% per annum up until 2025. Fixed broadband is forecast to grow at around 6.0% per annum, the fastest growth rate of the Central Asian countries included in the survey. Although mobile broadband coverage is generally good, fixed broadband connectivity outside the main population centres remains very underdeveloped.

Survey results

Tajikistan	Rating	Central Asia sample average	Central Asia sample Ranking
Broadband Market Attractiveness Index/100	50	53	2 nd
Broadband Investment Risk Index/100	43	48	3 rd
Best Practice Index/100	25	36	3 rd
Overall Broadband Investment Index/100	40	46	3 rd

In general, an index above 50/100 indicates a relatively good market for broadband investments.

The survey results show that Tajikistan is perceived to have below average broadband investment conditions, behind the other Central Asian markets surveyed. This is despite Tajikistan's position as the largest market by population, with a significantly higher forecast growth rate for broadband. Tajikistan scores relatively poorly on investment risk and

What respondents are saying about the market

Market size and potential

"We have passed the boom development in internet and mobile, now the companies have declined in income and the sector has frozen."

"Ours is a private initiative for Tajikistan, - we want to ensure there is broadband in every village with optic fibre and mobile."

"To achieve full coverage we need 3 base stations in every village for equipping with 4G and 5G."

"We are ready to invest. We have already expanded with 4G and we already have the infrastructure for launching 5G."

"Our plans include fibre optic and we already have ongoing projects in Dushanbe and big cities and for expansion."

"We have not done fixed broadband yet, but our return on investment is better on mobile and the money is not enough to go both ways - so we go for the higher returns on mobile."

"We will be ready for 5G and we see it as a big opportunity to go for a bigger market and increase our market."

"The youth market has high demand but with low spending power."

"If we rely on commercial investments only, then we will need 8-10 years for these to pay off."

"One of the many challenges is meeting the growth of subscribers at the same time as being constrained financially - we have problems securing loans for new investments."

"The uneconomic villages will need subsidies - to replace and upgrade old mobile handsets."

"Social media could be increased and usage would go up."

"The prospects for 5G are good, based on earlier fast development of 3G and 4G."

"At the moment 4G cannot meet the market demand HDTV usage is going up."

"High speed satellite and 5G will improve the market and meet more demand."

"We have been actively developing fixed broadband in the capital city and other cities over the last year."

"We are growing our basic fixed broadband service rapidly, with unlimited internet at low prices."

"Our fixed broadband market started with businesses. Now we have increased connections ten times since adding a consumer service."

"There is less demand in the regions due to low salaries of the population."

"In the regions there are only a few multi-storey buildings - so we don't have the demand, also, it is more expensive to serve them."

"Penetration in the cities is higher – we use fibre for the multi-story buildings."

"Covid has sped up the market, people do not have to meet in person."

"In Tajikistan, people exploit new technologies, 40% are young people who master new technologies and this drives us."

"We work on the potential for growth, some companies are only for PayTV, some bundle services with the internet,

"Bundling has not yet reached the level of shaping the market, technically or financially."

"We bring together a subscription for local TV, from Netflix and from others."

"The bandwidth of households is around 4-10Mbps."

Current market conditions

"The overall economic situation in the country bad - the purchasing power is low."

"The cost for the basic 10 Mbps broadband package is 20 to 30 US dollars per month and not all families can cope with this."

"93% of Tajikistan is mountainous."

“Laying fibre is difficult in the regions, these are technical and economic problems, administration is less of a problem.”

“It’s a mountainous country. Some communities cannot get internet - not all companies have access either.”

“From 7pm in evening until 10pm all mobile services are overloaded. There is a lack of basic infrastructure and lack of network capacity.”

“There are ten to twenty ISPs in the market - this changes, sometimes they start and are then not successful.”

“The competitive market is still young, additional effort is still required.”

“Several years ago we put in our new system because Tajik Telecom were underinvested.”

“Our targeting of geographic areas is based on licences which say we should cover 100% over several years - but unfortunately this has not happened.”

“There is a social need for telephony, but expansion is mostly commercially led.”

“To compete with Tajik Telecom, we have our own staff that digs trenches, lays cable and connects apartments.”

“For fixed broadband we offer subscribers free connection from our own infrastructure to companies and apartments. The first month’s subscription is free.”

“Our technology has a wide range - internet wifi, wimax, 4G and fibre access.”

“We have fibre over the over roofs of houses and shared between apartments.”

“We select the technology according to location - in Dushanbe we use fibre, in the regions we use wifi linked up to a point-to-point radio connection.”

“In the regions it is difficult to do fibre.”

“Internet could be high quality and we should have world-class connectivity - the cost increases and margins are very low and not enough to compensate for the risks we face on a daily basis.”

“There is a lack of loans that could be used to develop the sector.”

“We had a large-scale banking crisis and now people do not trust the Banks.”

“There is a trust towards mobile companies - we can use this.”

“Our main challenges are financial, plus the operational problem of ensuring energy supply.”

“Costs are high so the company is trying to raise prices - the market is trying to give more away and put the prices up to be able to invest.”

“There has been bad mobile coverage for more than 10 years, but when we try to expand, it can be a big issue. It can take around nine months and we sometimes have to bring in medical people to prove it is safe and that alone took six months.”

The overall strategy for the sector

“Tajikistan is one big society, not cities and regions. We do not expect issues with policy.”

“Some strategic concerns are solved by the companies; technology is introduced first and the law comes later.”

The survey respondents expressed the general view that although there was good demand for broadband services in Tajikistan, commercial supply was severely restricted by the relatively low spending power of the population and the high costs of investment. The investment conditions were tough because financial

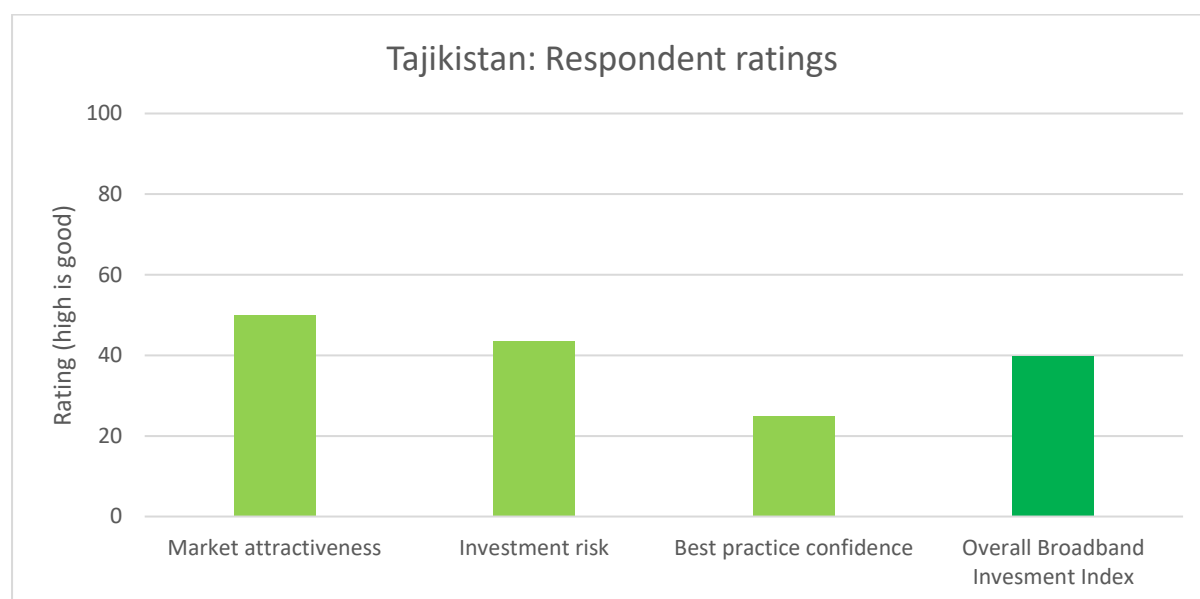
Survey results – Tajikistan

backing was restricted (the country has recently suffered a banking crisis) and high broadband supply costs arise from the lack of existing infrastructure and the high cost of installing services in a mountainous country.

In the view of the respondents, the situation is worsened by a lack of an overall strategy for digitalisation of the economy or support for ICT sector investments. In the absence of clear government policy or of an adequate legal and regulatory framework, the private sector provides the main impetus for sector innovation and growth.

Although the private sector has provided active competition in the mobile broadband sector, leading to reasonable mobile broadband penetration, there are still geographical areas of the country where no services exist. Fixed broadband services are very limited, mainly because the competitive private sector companies wanting to supply modern fixed broadband services rely largely on access to the state-owned incumbent's outdated network.

The difficult investment conditions are further analysed in the paragraphs below.



The overall Broadband Investment Index (right hand pillar) is calculated from the three indexes represented by the first three pillars. The full calculation methodology is given in section 2 of this report. For each pillar, the higher the score, the better the conditions are.

Tajikistan has relatively low ratings for market attractiveness, investment risk and best practice confidence. The top concerns are the lack of a clear digitalisation policy for Tajikistan, poor national infrastructures and supplier difficulties, particularly during the COVID-19 crisis. Other issues include an outdated legal and regulatory framework for the sector, the lack of state support for expanding broadband infrastructures into rural areas, and the high taxation levels for the sector. There is very low confidence that the adoption of best practices in the governance and regulation of the sector will be achieved within a reasonable timescale.

The overall index of broadband investor confidence places Tajikistan the lowest placed market for broadband investment conditions, behind Mongolia and Kyrgyz Republic.

More details regarding the main investor concerns are given in their comments below.

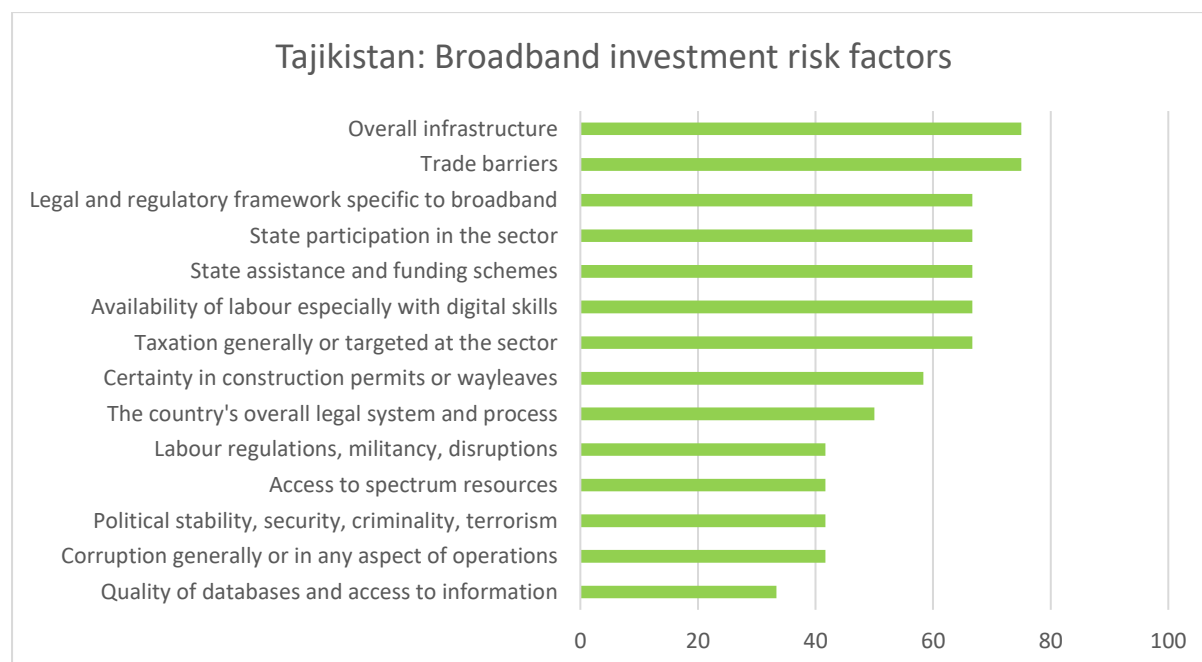
Respondent views

Survey results – Tajikistan

The survey considered 14 factors related to investment in ICT infrastructure. A description of these factors is given in section 2 of this report. Respondents were asked to express their view on whether the conditions for investment are affected by each factor in any of the following ways:

- Positively encourages investment
- Does not deter investment
- Mildly deters investment
- Strongly deters investment
- No opinion.

By assigning relative scores normalised to a scale of zero to 100, each factor has been ranked in terms of how much it contributes to investment risk.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

Respondents to the survey report that issues related to overall infrastructure, particularly electricity supply and the difficulties in equipment supply, particularly during the COVID-19 pandemic, have contributed the most risk to broadband investments. Other key issues highlighted during the survey are the inadequacies of the legal and regulatory framework and its implementation. Changes to the legal and regulatory framework generally and in particular the lack of support for infrastructure access and sharing.

Other key factors highlighted by the survey include the inefficiencies of the state-owned incumbent fixed operator Tajik Telecom and the absence of any state support for investments in broadband infrastructures for rural areas. The investment difficulties are further compounded by high taxation on the sector and by the problems in obtaining permission to install new broadband infrastructure.

There are also several other, although less important factors that also contribute to investment risks, including access to spectrum and the lack of digital skills.

The following comments give more details of the specific concerns of investors.

Overall infrastructure

How respondents expressed views about the overall infrastructure in Tajikistan

"Electricity supply is always a difficulty."

“Electricity rationing has already been introduced; it is switched regularly.”

“We have customers in Dushanbe with no electricity - in the regions also.”

“We connect customers with fibre and sometimes also we have to improve their electricity supply.”

“Electricity is cheap compared with other countries.”

“The availability of electricity is a problem - so we need back up supplies.”

“There is a problem of electricity in regions and getting energy supply to our infrastructure.”

“For electricity we have solar panels now at our mobile transmitter sites.”

“Battery life in the regions is less in the cold and the rationing of the main electricity supply makes battery life lower.”

“We only have a limited number of batteries, generators and panels.”

“There are technical challenges, most notably electricity supply difficulties impact us.”

“We raised the issue with the electricity company and we understand that in a mountainous country, it is harder to deliver infrastructure.”

“Power is expensive where we have to put our own infrastructures.”

“Our mobile transmitter base stations have diesel generators and solar power - when you go to rural areas where there is no electrification- we use several possibilities.”

The problems with electricity supply in remote areas are largely accepted by the survey respondents and they install their own stand-by generators and solar power technologies. Even in the cities, electrical power distribution is not universal. In addition, there are problems of electricity rationing, where supplies are cut off for periods of time. The private sector broadband service providers have to take unusual measures to ensure that their services operate in places where there is no electricity supply and during power cuts. This includes installing power supplies at the customer's locations to ensure that their individual broadband connections can function.

These difficulties add significantly to broadband investment costs. The state-owned incumbent operator has suffered from underinvestment in the past and there is a lack of state support to expand broadband services outside the areas that are commercially viable for private investors. In the view of survey respondents, these are the main factors that have resulted in relatively low market penetration of broadband services in Tajikistan, especially for fixed broadband services.

Trade and supplier issues

How respondents expressed views about the trade and supplier issues in Tajikistan

“All equipment, even cable is imported. The only thing we don't import is local labour.”

“We approached European operators to work with us, but they declined. We failed in working with Russians.”

“We invited Ericsson and Nokia, but they declined and as a result we could not get the equipment we wanted”

“The European suppliers are not coming; they do not participate in the tenders.”

“Kazakh and Russian suppliers, they reject the invitations to tender also.”

“Many suppliers are not interested in coming to Tajikistan, so we chose Huawei but now they are discredited.”

“So we continue with Huawei but now 90% of their equipment needs to be updated.”

“I now want to replace all Huawei equipment.”

“We had recent tender response from Turkey and one from another Chinese company.”

“We have replaced our Huawei core network equipment with Cisco.”

“The last two years because of Covid, logistics became much more difficult - borders were closed and vehicle runs suspended. It is more difficult when equipment comes from China and Russia.”

“We definitely found that Covid had an impact on the supply chain.”

“The bigger suppliers like Huawei found it easier, but the smaller suppliers are getting worse.”

“We could not bring engineers to Tajikistan for nine months because the border was closed - even now we have remaining supply chain issues with the smaller suppliers.”

“If we could take equipment on a lease basis over a longer term, then this would help us to invest.”

“Huawei requested up-front payment and they did not behave well.”

“Equipment and finance are the two big issues.”

“We buy equipment in USD and sell services in Tajik currency - so this can affect us.”

The problems with equipment supply are long-standing and have been further exposed during the COVID-19 pandemic. The survey respondents reported that there are no domestic manufacturers and that many global suppliers of equipment for modern broadband networks do not wish to supply operators in Tajikistan. This is related to the difficulties for the domestic companies in obtaining financing to purchase equipment, especially using foreign currency, when the company revenues arise from domestic sales in a weak local currency.

Private operators have purchased their main network equipment from the Chinese supplier Huawei, which has recently been banned by many countries for use in their core broadband networks²⁴. The survey respondents were aware of the problems with Huawei and now wish to replace their equipment using other suppliers.

The supply chain problems for their existing suppliers have been badly affected during the COVID-19 pandemic. This includes time delays at borders, cancellation or delay of road shipments and the inability of foreign personnel to travel to Tajikistan to provide support. Although the COVID-19 pandemic appeared to be subsiding in Tajikistan at the time of the survey, the respondents felt that the supply side issues will continue.

The legal and regulatory framework for broadband

How respondents expressed their views on the legal and regulatory framework for broadband in Tajikistan

“The first internet service providers had to create laws and the rules of the game themselves”

“This is our main problem in Tajikistan, we lack synergy with our legislation.”

²⁴ <https://www.statista.com/chart/17528/countries-which-have-banned-huawei-products/>

“Initially we wanted to increase our business in broadband by expansion. We were told it was unhealthy to compete and we were stopped.”

“As an internet service provider, we cannot do things ourselves, we have to go to the regulator, who also sits on the Tajik Telecom board.”

“Operators have to get a licence from the regulator. This licence obliges them to get permission from government body before they build any infrastructure.”

“When an operator wants to lay an optic fibre link, before launching commercially they have to get all certificates, including permissions to use the link.”

“We have got used to this bureaucracy since 2003, so we know how to deal with it. But it is one of the things that increases inefficiency.”

“We need to be able to bypass the international gateway to reduce our costs and to simplify maintenance and operational procedures.”

“At the moment we pay Tajik Telecom for international connectivity much more than they pay to the international providers. So they get the profit and we experience high costs.”

“Tajik Telecom’s behaviour on the international gateway significantly increases the cost of internet services in Tajikistan.”

“Retail price regulation only applies to companies like Tajik Telecom, using the anti-monopoly law.”

“When more competitors emerged, we tried to develop the sector jointly with the government.”

“The law exists but it is a question of implementation - this is not done with reliability and there is no real dispute settling process.”

“We are not legally bound but we are influenced to use the internet channels from Tajik Telecom. All operators have to do the same”

“The independent operators have alternative channels to a varying degree, but we have to co-operate with Tajik Telecom to stay in business.”

“We depend on Tajik Telecom but at the same time we have to be independent because in theory they could switch off access to the international network, although there has been no talk of that actually happening.”

Infrastructure access and sharing

“The association of mobile providers have launched a site-sharing initiative.”

“Tajik Telecom is the only operator that can allow you to use their system.”

“Tajik Telecom’s negotiations are commercially based - if you’re ready to pay, then they sell it to you, there is no price setting by regulators.”

“We rely on Tajik Telecom and have to pay them for fixing our service.”

“Our need to go through Tajik Telecom creates extra bureaucracy and increases cost.”

“For infrastructure we have our own base stations, we share sites, we use another operator’s towers and their fibre optic transmission links.”

“There is cooperation between operators, sometimes we go to the other operators who have the infrastructure already and we work together.”

“For infrastructure sharing, we negotiate between the companies and make a deal - there are no regulations.”

“We cooperate with the other private operators and this is effective on an individual basis.”

Survey results – Tajikistan

“For network capacity we know who to contact at the private operators to get the best price and technical conditions, so that we give the service to our client within a few days.”

“For our connection to regions and cities we have our own projects - in some cases we do it ourselves, sometimes using Tajik Telecom, sometimes using 4G, depending on the economics.”

“In some rural settlements they have ducts for the electricity infrastructure also electricity towers, so we use these.”

“Tajik Telecom has an underground ducting in Dushanbe and we can use it.”

“We use Tajik Telecom where they have ducts.”

“Operators split the share - we cooperate.”

“Almost 100% of our cable network is our own infrastructure in Dushanbe but we do use the Tajik Telecom underground system.”

“The cables of all operators are installed in Tajik Telecom’s ducts; in Dushanbe we depend on them.”

“In the regions we use what we can – electricity companies and local internet service providers.”

“We cooperate with Tajik Telecom in cases of extreme need.”

“If joint construction and sharing is agreed, then the infrastructure belongs to Tajik Telecom but we are allowed to use it.”

“Agreements are all done by contracts and inspectors from the regulator do get involved, but it’s not fully regulated yet.”

“Sharing agreements are one of the challenges - so we construct our own.”

“Our interaction with Tajik Telecom includes spectrum use - but we had to apply seven times before getting a licence.”

“The mobile operators have specific rules - if there are more than one of them on a site then if the electricity is cut off then we can share the back-up power systems.”

“The internet exchange does exist but its efficiency is not as good as expected, so the companies rely on each other for peering”.

“We need international connectivity but we cannot to bypass the centrally-organised gateway completely.”

“At the end of the day I am a participant in this market, so I want to collaborate and improve - for the sake of the other operators as well as us.”

The survey respondents expressed a number of concerns about the legal and regulatory framework for the sector that make it unsuitable for the expanding broadband market. In their view, the legal and regulatory framework needs updating to be more encouraging to broadband infrastructure investments and growth in services. This reform is needed to ensure broadband infrastructure is expanded in Tajikistan well beyond the current penetration levels, particularly for fixed broadband.

Although the market is competitive and private companies are allowed to make commercial investment decisions, there are a number of factors in the current market that slow down or reduce investments, leaving much broadband demand unmet or making services more expensive than they need to be.

The main factors in the legal and regulatory framework of Tajikistan and that hinder broadband investments are:

- The perceived lack of independence of the sector regulator. In Tajikistan, the state-owned incumbent operator Tajik Telecom still has a key role in important regulatory functions such as spectrum management and numbering assignments.

Survey results – Tajikistan

- The apparent lack of any regulatory rules for the limitation of anti-competitive behaviour by the state-owned incumbent operator Tajik Telecom. All private sector companies to some extent depend on the use of Tajik Telecom's network to supply competitive broadband services, including install cables in the existing underground ducting and providing main transmission to mobile transmitter bases stations. Private operators report that their dealings with Tajik Telecom suffer from unnecessary bureaucracy, ineffective procedures and a lack of priority. The problems expressed regarding Tajik Telecom are further discussed in the paragraphs below on the role of the state in Tajikistan.
- The lack of any best-practice regulation for wholesale markets, including the use of fair, transparent, non-discriminatory and cost-related charging rules.
- The absence of investment promotion measures for broadband infrastructure, including cost-reduction measures such as joint construction, joint use and best-practice infrastructure sharing regulations.

The additional and connected regulatory factors involved in granting permits for new infrastructure, the role of state-owned networks and the use of state subsidies, plus the lack of certainty in spectrum management have also been raised by survey respondents. These related issues are discussed in other parts of this section.

Further details of best practices in ensuring that the legal and regulatory framework fully supports broadband infrastructure investments including efficient wholesale market regulation plus infrastructure sharing and other cost reduction measures are included in Recommendation 3 in section 4 of this report.

The role of government and state funding

How respondents expressed views about the role of government and state funding in Tajikistan

"The most important thing to change is Tajik Telecom. Privatisation would improve the staff, it would get better people working for them, more professional, they could raise salaries to attract them."

"There are no schemes like in other countries where they have special projects to overcome digital connectivity gaps, for example in Russia."

"There is no government support in terms of subsidies."

"Even though Tajik Telecom is a dominant company, they offer regions commercial service in the same way as others - there is no universal service."

"Social policy targets are based on each company's preference."

"People write a letter to Government, then the company gets a letter from regulator saying please do this."

"There are some international digital inequality programmes, for example UNICEF has a programme."

"There are no government programmes only some individual humanitarian projects for connecting schools with the internet."

"There is no sign of any policy to ensure internet across the country."

"The programme to connect Russian schools was handed over to a private company to implement via Smart City, which is a state enterprise. They paid for the connection services on a monthly basis."

"Most projects are done by private enterprise as commercial services."

Survey results – Tajikistan

“There is no government funding - maybe there are plans, but nothing has been announced.”

“We are private companies we survive on our own using our own money at own risk. There is no government support for uneconomic expansion.”

“Tajik Telecom is not expanding to uneconomic places.”

“Everyone wants best quality and value for money - when Tajik Telecom develop strategic plans, they rely on private investment.”

“Government overall understands that companies have to have revenues - they state that there will be conditions, but they rely on the private companies to have social objectives.”

“On the health issue, people watch TV and hear that Covid was caused by 5G. The government understand how technology works and they try to explain it to people.”

The government takes a role in supporting local authorities, talking with local government about health issues with wireless.”

State involvement in the sector

In Tajikistan there has been underinvestment by the state-owned incumbent operator Tajik Telecom, resulting in very low levels of fixed infrastructure and services penetration. Private mobile investors have led the way in expanding mobile networks. Mobile broadband penetration has only reached 51 per 100 population, the lowest in the three Central Asian markets surveyed. Fixed broadband penetration remains very low, particularly in rural areas.

There is a lack of clear state policy for the sector and the regulatory agency is not perceived by the survey respondents of being sufficiently independent of the incumbent state-owned operator. Although a legal basis exists for a competitive market, many of the modern legal and regulatory safeguards in support of fair market conditions do not exist or are not implemented consistently. The private operators make arrangements amongst themselves on site sharing and other advantageous cooperation on network capacity use. They express their concerns that Tajik Telecom does not cooperate in a way that actively supports broadband investments and services expansion.

The experience from other countries suggests that the existence of a state-owned operator competing in a largely unregulated market alongside private companies tends to result in sub-optimal outcomes in terms of market and economic efficiency. This is because:

- Unless the charges for this wholesale rental of capacity are regulated on a fair, transparent, non-discriminatory and cost-related basis, the charges made by the larger operators (particularly an incumbent) will tend to be higher than the costs relative to a modern cost-efficient network. The respondents to the survey expressed the opinion that the efficiency of Tajik Telecom’s network is not what should be expected from best practice broadband technology.
- The private sector companies tend to invest in their own infrastructures, either because the incumbent networks lack sufficient quality or coverage or, more commonly because the private companies exhibit a strong commercial imperative to make timely investment decisions independently of other operators. This has been the case in most competitive telecommunications markets, particularly in the early and high-growth phases of mobile market development.
- In some cases the private mobile and fixed broadband operators had little choice but to use the existing infrastructures of the incumbent fixed network operator. This is largely because the cost of laying new ducts and cables is high and the need to obtain permission to build new infrastructure is often complex and time consuming.
- Unless there is clear (and policy-led) sector coordination between private and public sector players, total coverage in geographical areas of relatively low demand and high cost will rarely be fully achieved. If the private sector acts alone, there is not sufficient profit incentive to invest in unprofitable areas. If left to the public sector alone, then the lack of effective competition (or simply the lack of sufficient investment funds) will leave the rural markets for broadband services with insufficient consumer choice and quality.

Survey results – Tajikistan

In the view of survey respondents, clear policies for digitalisation, backed up by modern legal and regulatory frameworks to promote universal broadband investment and coverage have yet to be developed in Tajikistan.

In order to improve the investment conditions for all investors, different policy and regulatory approaches have been used in different countries. Many countries have solved the problems caused by differences in objectives between public and private sector interests by privatising the state assets, leading to a more common set of commercial outcomes amongst the players. Other countries have left the market entirely to the private sector and have been disappointed by the ‘digital divide’ resulting from lack of commercial investment in low population areas and where costs are highest. In these cases, one option has been to utilise state-owned networks to provide open access and low-cost capacity to the underserved geographical areas, so that the private sector can use this extended capacity to serve markets that they do not plan to reach entirely with their own infrastructure.

Whatever the resulting balance between the private and public operators and their relative market shares, there will generally be a need for clear and transparent market regulation. This is covered in the paragraphs below relating to the survey findings on the legal and regulatory framework.

For a fully efficient investment market, a clear framework of sector policy is required. This is considered further in Recommendations 1 and 2 in section 4 of this report.

State subsidies

According to the survey respondents, there appear to be no formalised system of state subsidies for the broadband sector in Tajikistan. In many countries, state subsidies seek to promote investments in telecommunications infrastructure to make services universally available, even in the more remote areas where commercial investments are not generally made. In Tajikistan, mobile broadband service coverage is the lowest of the Central Asian markets surveyed and for fixed broadband, good quality services are not yet generally available outside the main population centres.

The policy, legal and regulatory frameworks for the digitalisation of the economy in Tajikistan need to be developed by the government. The necessary implementation plans will need to define the role of public and privately owned broadband operators, with adequate provisions in the state budget to facilitate the expansion of broadband infrastructures and services to ensure universal digital access.

Examples of best practices regarding the state involvement in the sector and the use of state aid for broadband expansion are given in Recommendations 5 and 9 in section 4 of this report.

Digital skills

How respondents expressed views about the availability of digital skills in Tajikistan

“This is a big problem - the extent of staff available.”

“We do not have an education system that can produce people with the required skills.”

“Tajik Telecom is a public company the management style is bureaucratic.”

“Private sector companies create their own company academies; they also train young people.”

“The sector has labour skills issues all over the world.”

“People skills are a general issue. The knowledge of people in the mobile operators transfers from Russia.”

“We have to train on the job, but in order to develop ICT in Tajikistan, we need more staff.”

Survey results – Tajikistan

“Staffing is a problem, but not the main problem - if we had access to long and cheap money the staff qualifications would not be a problem.”

“We invest in staff education and training - we are capable enough.”

“The salary problem does not radically reduce the quality of our work; we involve staff for staff development - get them engaged.”

The views expressed by respondents on the availability of digital skills in Tajikistan echo the views expressed in most other countries surveyed. The concerns cover not only the limited availability of skilled staff to work in broadband networks and service suppliers, but also in the skill levels of consumers and businesses which could limit future broadband usage and market growth. Further analysis on both the demand and supply side responses are given in Recommendation 7 in section 4 of this report.

Examples of best practices in tackling skills shortages in the ICT sector, see Recommendation 7 in section 4 of this report.

Taxation**How respondents expressed views about taxation of the sector in Tajikistan**

“One of our largest needs is to reduce the tax payments.”

“There are specific telecommunications taxes – there is a special tax charged to mobile subscribers.”

“We pay a 2% licence fee to the regulator and this covers our spectrum usage, but we pay extra for numbering ranges.”

“Taxes are not introduced in a connected way; they are disconnected to public policy.”

“The general view is very simplistic - they know we pay taxes and we have invested lots of money - they know we will adapt to an additional 3% tax burden and they know we will translate this burden onto our customers in tariff increases.”

“Public think we are very profitable - so we shouldn’t complain, but people don’t understand our need for investment and the risks we have to take.”

The survey respondents expressed the view that the special taxes on the telecommunications sector extract cash from the operators that could otherwise be used for investment in broadband infrastructure expansion. The state receipts from the operators are not directly ploughed back into the sector in support of universal service provision or for directly supporting increasing connectivity or take-up of broadband networks and services.

Tax issues are examined further in Recommendations 8 in section 4 of this report.

Other issues**How respondents express their views on other issues in Tajikistan****Granting of permits**

“Permission is not regulated fully, there were some procedures for permission 20-30 years ago and we incorporate this into the individual agreements.”

“Tajik Telecom’s response can be positive or negative - they also put conditions for sharing costs, for example if we invest in some infrastructure then we get a permit.”

“We need a licence for towers and for digging trenches for ducting.”

“If we make an application to Tajik Telecom to use their facilities, then according to the regulations, we have to apply to different regional units of Tajik Telecom and also involve the various municipalities.”

“If the location is near a railroad - we apply to the railway authority, if it’s a line-of-sight radio system then we have to go to the municipality.”

“Often we have to go to several authorities and we normally get permission.”

“For the building out of our own fibre, mainly the municipalities are very cooperative.”

“If we put fibre where nothing existed, for example putting up poles, laying cables, we have to get permission from the regulator and Tajik Telecom are also involved.”

Access to spectrum

“The regulator allocates spectrum and we got some permissions for some frequencies - it’s enough for us.”

“There are no high up-front fees, the regulator does not frequencies, there are no auctions, we use the frequencies and pay a 2% licence fee on turnover.”

“We know how polluted the spectrum is - there is no efficient control and monitoring – the regulator has experienced a reduction of specialists.”

“We have all licences we need and these are updated every seven years.”

“Spectrum has already been given to the companies; the spectrum process is on requests to the regulator”

“You go to the regulator with a request, if there is unused spectrum they can give licences, but some other frequencies are already taken.”

“We do not have any issue with spectrum because we can show that we are using it.”

“Our licence covers whole country and we have voice service coverage of over 90%”

“All four mobile companies have 5G licences and two already have organised test zones.”

“There are no specific obligations for 5G.”

“The 5G spectrum was allocated in 2 stages.”

“We have to demonstrate that we are using the frequencies otherwise the licences are not renewed.”

“Spectrum is not costly if we exclude unfair competition so that all proper companies get the frequencies equally.”

“If we get a 4G licence, we should be able to get over 90% coverage.”

“4G cannot be used in some places so we need 5G in 2022 23.”

“We want to demonstrate 5G in a pilot, but we cannot cover the whole country until suppliers produce 5G equipment.”

“Tajik Telecom has mostly fixed wireline services, they do not use much spectrum.”

“There have been cases where we have selected frequencies but we then found that these were being used undocumented by other operators.”

“In the regions where there is no infrastructure, we use wifi but the problem is the licence for wifi is difficult.”

“If we set up a connection where there is a big gap in development, we have to speed up the process - usually you get wifi without licence.”

“Unfortunately when operators started applying for wifi then they need to get licence and the frequency they want to use as well as the antennas.”

“There is a monthly fee for a wifi licence, so we have to increase our tariff to customers.”

“We pay one off and monthly fee plus a monitoring fee to Tajik Telecom.”

“People are afraid of radiation - when we expand to new places we have talks with local authorities and people there are afraid of health issues. This sometimes delays the discussions.”

Permit granting

The lack of procedures for obtaining permits to build broadband infrastructure is a general concern expressed by respondents.

Examples of best practices to strengthen the legal basis and the streamlining of procedures for obtaining permits are given in Recommendation 4 in section 4 of this report.

Access to spectrum

Mobile broadband is forecast to grow at 15% per annum up to 2025). The survey respondents expressed the view that although their current mobile broadband service needs are met by their existing spectrum holdings, the situation could become more uncertain in the future. Private sector players in Tajikistan expressed the view that the spectrum allocation process is not sufficiently independent and transparent.

New spectrum awards have already been made to the private mobile operators for the introduction of 5G services. Some parts of the spectrum assigned to mobile broadband are not yet available for release. There is general uncertainty regarding the procedures that will be used in the future to allocate available spectrum for mobile broadband. The survey respondents believe that the rules and responsibilities for transparent processing and pricing should be clarified.





In the medium to longer term, the spectrum release methodologies and pricing will become a significantly greater issue. The prevailing respondent view is of greater uncertainty in the future especially with regard to the role of 5G mobile services in an expanding digital marketplace. The key issues are the balance between spectrum pricing and the investment needs for 5G infrastructure and whether other sectors of industry should be able to exploit spectrum in a wider 5G digitally connected environment, rather than having to collaborate solely with the established telecommunications sector players.

If Tajikistan is to take full advantage of the expected transformational benefits of 5G and its related applications, then the procedures for awarding 5G spectrum need to be improved using a more liberalised, fair and transparent approach, taking account of the needs of the market (see also Recommendation 9 in section 4 of this report).

Recommendations

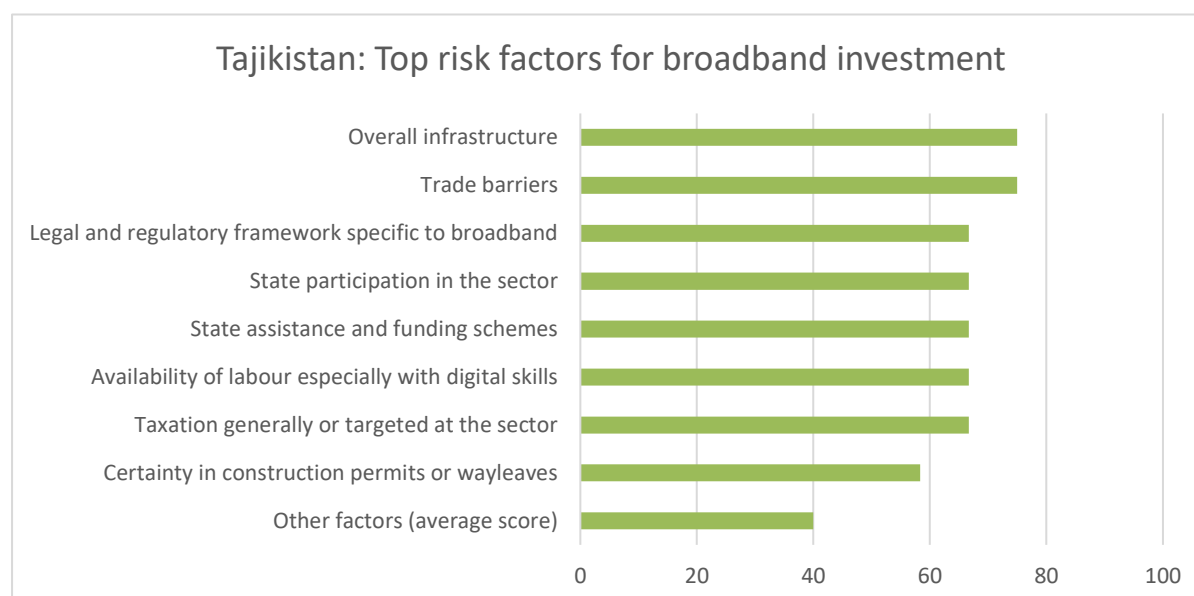
The detailed recommendations in this report are given in section 4. There are two types of recommendations, the first type to improve the overall attractiveness of markets and the second type to reduce investment risks.

For Tajikistan, the respondent views regarding market attractiveness are summarised below, together with the relevant recommendations for improving the overall attractiveness of the market.

Market attractiveness factors	Tajikistan	Recommendations for improving the overall attractiveness of the market (See section 4)
Overall size of the market, in population terms and relative spending power		Recommendation 1
Growth potential of the market, in terms of demand for broadband-services		
Efficiency of the markets in terms of fair competitive conditions		Recommendations 1 and 3
A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up		Recommendation 2

 - Good /  - Medium /  - Poor








The issues raised by respondents that most contribute to broadband investment risk in Tajikistan are shown below.



A score of zero would indicate that the factor has no influence at all on investment decisions, a maximum score of 100 would indicate that the risk associated with the factor is so high that it completely puts off any investment.

The priorities for investors are summarised below, together with references to the relevant recommendations for reducing broadband investment risks given in section 4 of this report.

Survey results – Tajikistan

Investment risk factors	Tajikistan	Recommendations for reducing broadband investment risks (See section 4)
Overall infrastructure		
Trade barriers		
Legal and regulatory framework specific to electronic communications and broadband		Recommendations 1 and 3
State participation in the sector		Recommendation 5
State assistance and funding schemes		Recommendation 6
Taxation generally or targeted at the sector		Recommendation 8
Certainty in construction permits and wayleaves.		Recommendation 4

 High priority
  Medium priority

4. DETAILED RECOMMENDATIONS

The comments made by respondents regarding the attractiveness of each of the three Central Asian markets surveyed (Kyrgyz Republic, Mongolia and Tajikistan) and their concerns about the investment risks involved are given in section 3 of this report. The analysis in section 3 has also resulted in a set of priorities for actions in each market to improve investment conditions.

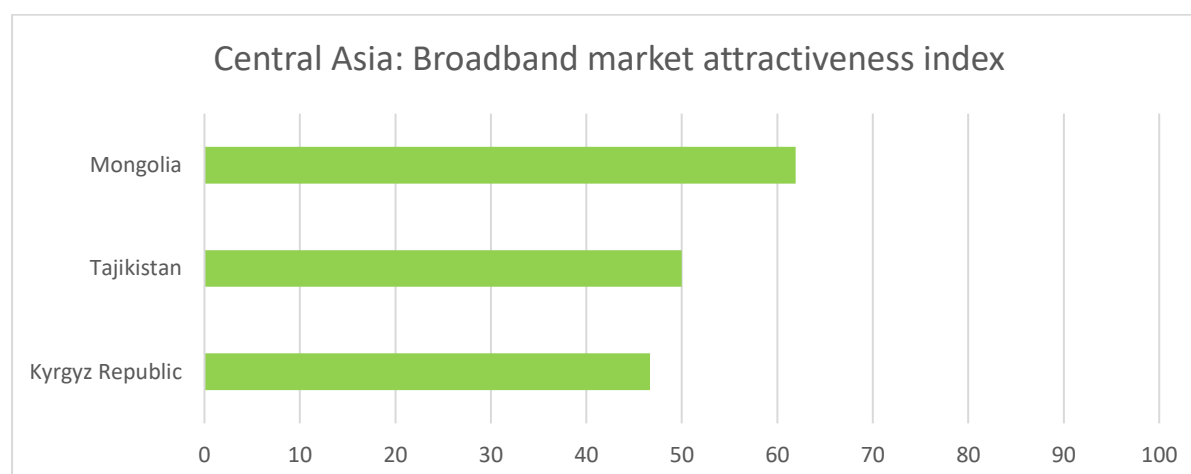
Some general recommendations are given in the executive summary (section 0) of this report under the heading “The general recommendations resulting from this survey”.

This section gives a set of more detailed recommendations to improve the investment conditions in the broadband markets of the three Central Asian markets surveyed. These detailed recommendations focus on the priorities for action resulting from the survey, with the key recommendations for each market being determined by the specific priorities for action, country-by-country.

The general recommendations in section 0 should be taken together with the detailed recommendations in this section dealing with the specific priorities for action identified in section 3 for each country. The main purpose of these recommendations, in accordance with the survey’s overall objectives stated in section 1, is “to inform investors, policy makers, regulatory and other influencers of investment so that they can make decisions that will increase effectiveness in sector investments and thereby improving broadband infrastructure coverage and capacity”.

Recommendations on improving the overall attractiveness of the market

The market attractiveness, in terms of the pure market potential regardless of the investment risks involved, was rated by respondents as follows:















On the comparative scale, zero would indicate a perception that the broadband market has no attraction. A score of 100 would indicate a perception that the market potential is perfect.

From the comments received from respondents in each market, the general factors that make a market more or less attractive can be summarised as follows:

- The overall size of the market, in population terms and consumers’ relative spending power.
- The growth potential of the market, in terms of demand for broadband-enabled services.
- The efficiency of the markets in terms of fair competitive conditions.
- A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up.

The following table summarises the views of respondents for each country:

Central Asian markets: Market attractiveness factors

Market attractiveness factors	Kyrgyz Republic	Mongolia	Tajikistan
Overall size of the market, in population terms and relative spending power			
Growth potential of the market, in terms of demand for broadband-services			
Efficiency of the markets in terms of fair competitive conditions			
A clear national ICT market strategy for the country with stated ambitions and goals, for example targets for broadband coverage and take-up			

 - Good /  - Medium /  - Poor

Market size and spending power

In terms of market size, Tajikistan has the highest population at 9.5m. The other two markets have relatively small populations of 6.5m (Kyrgyz Republic) and 3.4m (Mongolia). The populations of all three countries are increasing.

In all markets, broadband growth arises from a combination of new subscriber take-up, network expansion into new geographical areas, and most significantly from consumer demand for higher data speeds. The introduction of eGovernment services can also provide a stimulus to broadband demand, for example in Mongolia, where the “eMongolia” platform was seen as a major benefit in the response to the COVID-19 pandemic.

New demand is being taken up by both fixed and mobile broadband offerings. The respondents recognise that in the future, significantly more investments in fixed (mainly fibre-based) broadband infrastructure will be necessary, as business and consumer demand embrace more digital services. Mobile broadband services have more universal geographical coverage in all four markets, with fixed broadband infrastructure lagging behind, particularly in rural areas. In Tajikistan, mobile broadband users outnumber fixed broadband users by over 25 to one, in Kyrgyz Republic by 16 to one and in Mongolia by 13 to one. This compares to a figure of around three to one on average in the EU.

The lack of affordability of broadband services is often cited as a feature of low market penetration.

Broadband affordability	Kyrgyz Republic	Mongolia	Tajikistan	European average
Fixed broadband price as % of GNI per capita	8.2%	1.8%	7.4%	1.2%
Mobile broadband price as % of GNI per capita	2.8%	1.9%	7.4%	0.5%

[Source: ITU]

In terms of pricing, fixed and mobile broadband are most affordable (relative to Gross National Income per capita) in Mongolia. In Kyrgyz Republic, mobile broadband prices are significantly better than fixed broadband prices. In Tajikistan, both fixed and mobile broadband services are the least affordable. In all

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three countries, the levels of broadband services affordability are not as good as the European average prices. These results largely reflect the greater market efficiencies in Europe, where most countries have more cost-effective and widespread broadband network infrastructures and broadband market competition is better developed.

Market growth potential

The mobile broadband market in Mongolia has already reached very high levels of saturation and market growth will be limited to growth in services and delivered broadband quality and speed. This favours the fixed broadband market in Mongolia, which is already developing more strongly than in Kyrgyz Republic or in Tajikistan.

Kyrgyz Republic has reasonable growth potential in both fixed and mobile broadband. The market is still limited outside the main population centres by underdeveloped digital infrastructures.

Tajikistan has the best broadband growth potential, especially for mobile broadband, where 5G is already being prepared for launch. Fixed broadband growth will continue to arise mostly in urban centres and is limited by high infrastructure costs in the mountainous terrain of the more rural areas.

The survey respondents' views of market potential are affected by uncertainties in the market at a time of continuing and costly investments, currently including fibre network and 4G broadband rollouts. There are also added risks in the mobile broadband market, especially with the lack of clarity on future spectrum release dates and the current uncertainties of a mobile operator-based business case for 5G investments. There is also no clear indication yet in the three Central Asian markets that other significant players will enter future markets to exploit the added potential 5G-enabled "Internet of Things" markets.

Market efficiency

Another factor creating market uncertainty is the lack of confidence by respondents regarding the development of their legal and regulatory frameworks for the more liberalised market conditions. In Tajikistan particularly, the competitive market conditions have been the slowest to adapt, with investors expressing uncertainties about progress towards the adoption of best-practices. The investment barriers vary from country-to-country as does the priority for governments and regulators to resolve the policy, legal and regulatory issues identified. The full analysis of the responses from all three markets and the resulting priority areas for market reforms, are detailed in section 3 of this report.

A national broadband strategy

Of general further concern expressed by respondents in all three countries is the lack of a clear national policy-led approach to sector development, acknowledging broadband's increasing role in creating a more efficient digital economy. The participants in the survey expressed the general need for a comprehensive national plan for broadband incorporating clear targets for coverage and take-up, backed up by sector-wide policy, regulatory and financing frameworks.

It follows that, in order to increase the overall attractiveness of the markets for broadband infrastructure investments, a good perception of a country's policy and regulation towards more effective markets is needed. The first two recommendations below seek to increase investor confidence, even in those markets that are already reasonably attractive in pure market size and growth terms.

The remaining recommendations (3 to 9) seek to reduce the specific investment barriers and risks highlighted by respondents and prioritised in the survey on a country-by-country basis.

Recommendation 1: Demonstrating a clear commitment to the effective implementation of an investor-friendly legal and regulatory framework for the broadband market

Although the four countries surveyed have moved to more competitive markets, the transition to fully liberalised, investor-friendly legal and regulatory conditions has not yet been achieved. For example, in all three countries, respondents believe that the remaining state ownership of network operators still has a detrimental influence on competitive market conditions. In all three countries, private companies (ranging from large national mobile players to small local internet service providers) have contributed to broadband services growth, often investing to fill the digital infrastructure gaps unfilled by incumbent operators from

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the monopoly era. In most cases, even where the market participants have invested in new parallel infrastructures, the newer players remain dependent to some extent on the existing infrastructures, ranging from existing ducting, main transmission links, local access networks to international gateways.

Under these conditions, the ability of the legal and regulatory framework to ensure fair competitive market conditions has been severely exposed. There are remaining structural and competitive market barriers, including uncertainties regarding spectrum availability and the lack of effective procedures for obtaining permits to expand broadband infrastructure.

The nature of these market distortions in each country, as perceived by the survey participants, is examined more closely in section 3 of this report.

In the three Central Asian markets, respondents still have a strong preference for operators to construct and operate their own separate networks. Looking to the future, as markets expand into more rural geographical areas, relative costs will rise alongside declining average revenues and investment returns. There is a clear realisation amongst the survey participants that more collaborative models for joint investments and infrastructure sharing will have to be developed.

In the full EBRD 2020/21 survey of around 20 countries, the most often cited model for promoting more effective broadband infrastructure investments is the EU's legal and regulatory framework for electronic communications²⁵. As well as clear rules on universal services and quality, consumer protection, fair competition, regulatory oversight and enforcement, the EU regulatory framework includes the "Directive on measures to reduce the cost of deploying high-speed electronic communications networks"²⁶ which has been applied in all EU countries since 2016. These measures have led to better coordinated investments between the public and private sectors, in particular to promote more infrastructure investments and increase connectivity in rural areas.

The commitment to broadband investment enablers is part of the EU's overall policy towards a better-connected society. Many countries surveyed have similar "digital society" aspirations and respondents generally recognise the EU approach to broadband investments as being best practice for the sector. The general message from the survey is that unless the legal and regulatory frameworks in the surveyed countries are updated explicitly to support broadband investment efficiency, then the markets will continue to operate in a relatively uncoordinated way. Failure to adopt best practices will lead to far slower progress in achieving the universal high-speed broadband coverage required for full digitalisation, leading to better overall economic and societal development.

It is recommended that the Central Asian markets adopt a path to faster use of best practice broadband market regulation, backed up by a fully effective sector regulatory body with the powers to enforce the relevant competitive market safeguards and investment-promoting measures. The remainder of these detailed recommendations (below) include more details of the required policy, legal and regulatory best-practices aimed at broadband markets and investments.

Many of the issues faced in broadband markets have been amplified during the COVID-19 pandemic, including the need for better access to broadband services (both fixed and mobile), the degree of dependency of users on reliable broadband connections and the overall security and resilience of digital broadband networks. The sector's response to the COVID-19 experience is considered in more detail in an Annex to this report.

²⁵ <https://digital-strategy.ec.europa.eu/en/policies/electronic-communications-laws>

²⁶ <https://ec.europa.eu/digital-single-market/en/cost-reduction-measures>

Recommendation 2: Agreeing a clear national broadband strategy with stated ambitions and goals, including targets for broadband coverage and take-up

In the opinion of respondents, national government policy makers need to demonstrate a strong commitment to the sector and in particular, emphasising the increased role of broadband infrastructure investments for promoting economic growth and better living standards. Clear targets should be set at national level for broadband connectivity to allow businesses and households full access to internet services of high speed and quality at affordable prices. The results of this survey show a lack of clarity and national coordination of overall development of the ICT sector. Generally, respondents expressed their willingness to participate in their national debates and to contribute towards the development of national plans and new investment opportunities.

Experience in preparing and implementing policies across a number of countries²⁷, has highlighted the key characteristics of effective national broadband plans:

- National broadband plans should have a local context, in terms of both the current stage of ICT development and the political aims of the plans.
- Markets in the earlier stages of ICT development have a greater focus on supply-side initiatives, building network infrastructures and encouraging widespread internet usage. Markets in later stages of ICT development focus more on demand-side measures and embedding ICT into the national society and economy.
- Supply-side targets (for example stated levels of broadband coverage and penetration) lend themselves more readily to being expressed in specific, measurable terms.
- Effective government actions often focus on the stimulation of private funding and commercial activities. However, governments always play an important role in the central coordination of initiatives, in monitoring progress, and in ensuring the plan's goals are achieved.

In three of the Central Asian markets surveyed, state funding for broadband expansion is being employed in different ways:

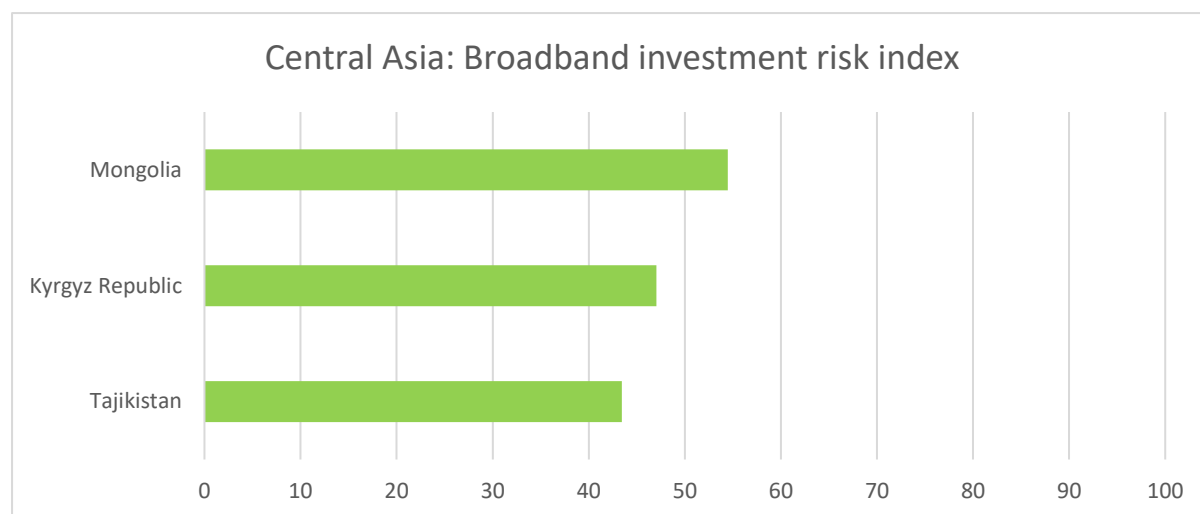
- In Kyrgyz Republic, the incumbent operator remains state owned and provides both fixed wholesale and retail broadband services but there are no special funds available for connecting the more remote areas.
- In Mongolia, a separate state-owned and operated network infrastructure exists to provide a national wholesale broadband infrastructure to the competitive market players. The wholesale capacity is available to broadband providers for offering retail services to customers. Mongolia also has a state fund to be used (via a competitive bidding process) to subsidise new infrastructure projects on a village-by-village basis.
- In Tajikistan, the government-owned fixed incumbent operator uses the state budget to expand its network sometimes using the resources of the competitive market players. There is no formalised system of state funding for infrastructure investments although in some cases, private operators are allowed to use the state-owned network at concessionary rates to serve public sector clients.

Further recommendations regarding the role of the state and the use of state funding subsidies in promoting broadband investments in areas that remain unattractive to private investors, are further considered in recommendations 5 and 9 below.

²⁷ <https://www.cullen-international.com/studies/2014/Benchmarking-15-national-broadband-plans.html>

Recommendations on reducing the overall investment risks

In addition to the factors related to market attractiveness, this survey has examined the opinions of respondents regarding investment risks – including a list of 14 potential barriers to investment. These opinions are summarised in section 3 of this report.



On the comparative scale, zero would indicate a perception that the broadband market has no enabling policy or has other absolute barriers and risks to investment. A score of 100 would indicate a perception that the full implementation of policies, legal and regulatory frameworks and other enabling conditions are already in place leaving no barriers or risks to investment.

The results show that, taking all 14 risk factors into consideration, Mongolia has the least investment risk for broadband infrastructure, followed by Kyrgyz Republic. Tajikistan has the most risk.

The risks for each factor varied from market to market, as shown in the table below. Of the 14 factors, 12 have medium to high risk in at least one market:

- The legal and regulatory framework specific to electronic communications and broadband investments.
- Political stability, security, criminality, terrorism.
- Certainty in construction permits or wayleaves.
- The country's overall legal system, predictability and process.
- State participation in the sector.
- Access to state-controlled resources, particularly spectrum.
- Availability of labour especially with digital skills.
- Taxation generally or targeted at the sector.
- Corruption generally or in any aspect of operations.
- State assistance and funding schemes.
- Quality of databases and access to information.
- Overall infrastructure.

The following two remaining factors presented only low risk in all markets:

- Labour regulations, employment agreements, militancy, disruptions.
- Trade barriers.

Central Asian markets: Priorities for action

Investment risk factors	Kyrgyz Republic	Mongolia	Tajikistan
Legal and regulatory framework for broadband	⚠	⚠	⚠
Certainty in construction permits or wayleaves.	⚠	⚠	⚠
State participation in the sector	⚠	⚠	⚠
State assistance and funding schemes	⚠	⚠	⚠
Availability of labour especially with digital skills	⚠	⚠	⚠
Trade barriers	⚠	⚠	⚠
Taxation generally or targeted at the sector.	⚠	⚠	⚠
Overall infrastructure	⚠	⚠	⚠
Political stability	⚠	⚠	⚠
Access to spectrum resources	⚠	⚠	⚠
The country's overall legal system and process	⚠	⚠	⚠
Corruption generally or applied to the sector	⚠	⚠	⚠
Labour regulations	⚠	⚠	⚠
Quality of databases and access to information	⚠	⚠	⚠

⚠ - Low priority/ ⚠ - Medium priority/ ⚠ - High priority

The following recommendations aim to reduce overall investment risks for broadband markets across the three Central Asian markets, with the priorities for each country taken from the above table.

Recommendation 3: Ensuring that the legal and regulatory framework fully supports broadband infrastructure investments

1) The importance of effective wholesale markets

Across most countries, specific legal and regulatory conditions have been applied to the electronic communications sector in order to facilitate the significant technological and institutional changes that have taken place in the sector. These frameworks have resulted in more competitive markets by allowing greater consumer choice and by implementing specific competitive safeguards that apply to new entrants in order to limit the market power of a previous monopoly incumbent.

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The capital-intensive nature of telecommunications infrastructure means that a new entrant cannot simply replicate the main components of a network in order to compete fully with an incumbent operator that has previously enjoyed a monopoly position. A faster transition to more competitive market conditions can be achieved by the creation of an effective wholesale market for infrastructure. Regulators have therefore sought to impose obligations on an incumbent operator to open up its network so that capacity can be rented out to other operators on fair terms.

This means that in going for market growth, a more recent market entrant has two options to expand its reach:

- The new entrant could invest in its own infrastructure or,
- if it is not ready to invest, it could rent capacity from the incumbent.

Where using the wholesale option is clearly more cost-effective, retail competition can grow to meet market demands quicker, because the infrastructure to provide service is already in place.

The regulators in the markets surveyed have created rules that oblige incumbent operators to open up (or “unbundle”) their networks. Typically, the respondents to this survey have expressed dissatisfaction that this obligation has not been properly enforced or has not operated fairly. Typically, the incumbent fixed line operator has not made it routinely possible for the newer market entrants to use their network on the terms specified by the regulator. The result of this wholesale market barrier is that the fixed broadband retail market has grown more slowly in comparison to other markets. The average fixed broadband penetration in the three Central Asian markets is only 4.4 per 100 population, which is very significantly less than the average penetration rate for fixed broadband in the EU, where wholesale market regulations have been applied more effectively.

The wholesale market barriers typically used by incumbents fall into several categories:

- Procedural barriers – the incumbent operator will typically give preference to its own needs rather than releasing capacity for the use of other operators. This often leads to long delays (respondents have claimed wholesale requests can take up to two years to fulfil).
- Lack of capacity – the incumbent operator claims that there is no capacity available for renting, for example that a duct is already full or that a cable has no spare capacity. In an effective wholesale market, the capacity planned and implemented by the supplier should take account of the additional demands of all types of retail and wholesale users, but this is rarely the case in practice.
- “Price squeezing” or “margin squeezing” – the incumbent typically calculates the wholesale charge at a rate deliberately designed to ensure that a competitor cannot match the incumbent’s offerings in the downstream retail market on price. The solution is for the regulator to use a cost modelling approach that assumes the most efficient technology use in the network and imposes a fair “cost plus rate of return” wholesale price. (In the absence of a cost model, the regulator could impose a “retail minus” charge with sufficient margin to attract users into the wholesale market.)

In most cases, where an operator seeking wholesale access is denied, there are no effective dispute resolution procedures in operation to enforce the regulations. In the most extreme cases, where wholesale access regulations do exist, they are simply ignored.

It is therefore recommended that the conditions for effective wholesale markets are fully implemented by sector regulators and if necessary, backed up by legally binding dispute resolution and enforcement measures. Unless best practices in wholesale access regulations are implemented effectively in the three Central Asian markets surveyed, fixed broadband markets in particular will develop more slowly than would normally be expected and consumer demands will not be fully satisfied.

2) Cost reduction measures for broadband investments

The roll-out of broadband infrastructure requires substantial investments. The civil engineering component of these investments, such as the digging-up of roads, the building of towers, manholes and other specialist street works, can account for up to 80% of the overall cost of deploying high-speed networks²⁸.

EU rules on broadband cost-reduction

“To help achieve its “Connectivity for a Gigabit European Society”²⁹ targets, the European Union has sought to incentivise as much broadband infrastructure investment as possible in the EU member states. Focusing on the high civil works component of the necessary investments, the “Directive on measures to reduce the cost of deploying high-speed electronic communications networks” (2014/61/EU)³⁰, aims to facilitate and incentivise the deployment of high-speed electronic communications networks by reducing its cost.

“The Directive includes measures, such as the sharing and re-use of existing physical infrastructure, which can create conditions for a more cost-efficient network deployment. It will help create a digital economy that delivers sustainable economic and social benefits based on modern online services and fast internet connections.

“The measures of the Directive focus on four main areas:

- Access to existing physical infrastructure (e.g. ducts, poles or masts) including those belonging to energy and other utilities, for operators willing to deploy high speed broadband networks.*
- Efficient coordination of civil works.*
- Faster, simpler and more transparent permit-granting procedures.*
- Equipping new buildings and major renovations with high-speed physical infrastructures (e.g. mini-ducts, access point) and access to in-building infrastructure.*

“Member States had to transpose the EU Directive into national legislation and since 1 July 2016, they have applied these measures.”

Extract from “EU rules to reduce the cost of high-speed broadband deployment”
<https://ec.europa.eu/digital-single-market/en/cost-reduction-measures>

Respondents in all four markets surveyed expressed views that their existing conditions for all the above topics (access to ducts, poles and masts, coordination of civil works, the granting of permits and for equipping buildings for broadband) were unnecessarily slow, inconsistent and in many cases unfair. There is also a clear recognition that the EU measures represent sector best practice.

It is recommended that regulators and government bodies (both at state and municipal level) should examine the scope of the specific regulatory provisions described above for the EU and incorporate these into their legal and regulatory frameworks. If these best-practice measures are implemented in the Central Asian markets and properly enforced by the regulator, then the investment conditions for broadband infrastructures would improve significantly.

Further consideration is given in Recommendation 4 to the procedures for faster, simpler granting of permits.

3. Network sharing will be a key lever to reduce cost and make 5G deployments feasible

Network sharing should become a standard part of the operating model for mobile operators, and this awareness is accelerating as decisions on investing in 5G networks approach. The business cases for 5G

²⁸ <https://www.nic.org.uk/wp-content/uploads/Cost-analysis.pdf>

²⁹ <https://ec.europa.eu/digital-single-market/en/policies/improving-connectivity-and-access>

³⁰ <https://ec.europa.eu/digital-single-market/en/cost-reduction-measures>

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investments are still uncertain in all three Central Asian markets surveyed. It remains unlikely that commercial 5G services will be launched before 2023 in these markets.

Until now, the imperative for gaining market share has been the predominant justification for mobile operators to invest. This still applies to the current roll-out of 4G services in the three Central Asian countries surveyed, where network coverage is still seen as one of the key competitive differentiators. The more established mobile operators have been generally reluctant to share their infrastructure with newer entrants that are still rolling out their networks. In Mongolia, the situation is different because the state-owned network operators are mandated to provide wholesale capacity for independent operators, backed up by a regulation outlawing the use of “inefficient duplication” of ICT network infrastructure³¹. The regulation is designed to prevent independent operators from investing in their own separate infrastructures if the capacity already exists from another operator. The Mongolian regulation has led to the reduction in investment choices for independent operators. The preference for having their own infrastructure is still, in some cases, strong enough for operators to invest in non-optimal (and therefore less cost effective) routes for new infrastructure in order to avoid the “inefficient duplication” regulations. This is an example of regulation that, although intended to avoid costly duplication, instead leads to some investment inefficiencies and lack of investment options.

In general, the drive for market share has resulted in mobile operators investing largely in their own separate infrastructures in the knowledge that trying to coordinate with a competitor would delay investments at the expense of market share gains. Investment returns on the current 4G markets are still not guaranteed in the short term. There is also some general uncertainty about the availability, timing and cost levels of additional spectrum resources in each country.

Respondents have expressed the view that during the lead-up to the decisions for 5G investment; that is between now and 2023, the sector stakeholders should seek more collaborative ways to achieve further mobile services development in the 5G and ‘Internet of Things’ era. If cooperation can be agreed, then significant cost reduction opportunities can be achieved across the sector, leading to more confident investment conditions and faster roll-out of new services.

Network sharing and 5G: A turning point for lone riders

“Operators in some countries have been able to reduce the total cost of ownership by up to 30% while improving network quality through sharing a variety of both active and passive equipment. 5G will be no exception, with operators eyeing new ways of accelerating the deployment of an otherwise daunting investment.”

“The cost savings potential for network sharing is even stronger with 5G, as greenfield deployment is better suited for sharing because it avoids the cost of network consolidation. For example, the cost of small-cell deployment can be reduced by up to 50 percent if three players share the same network. But the rationale for sharing extends beyond cost, as it could solve many practical roadblocks of 5G deployment in urban areas, such as the potential for urban disruption and visual pollution from the installation of excessive equipment and fibre.”

“Given these arguments for network sharing, operators will need to have strong commercial rationale to justify stand-alone deployment of 5G, rather than sharing a common 5G network. Although such cases may exist for certain operators in particular markets, for many operators, sharing will be a necessity and requires preparation now.”

[Source: <https://www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/network-sharing-and-5g-a-turning-point-for-lone-riders>]

Network sharing is widely seen as a means to accelerate 5G deployment, and to minimise disturbances from construction work and visual pollution. Given that 5G thinking is still in its infancy in the three Central Asian

³¹ <https://crc.gov.mn/en/k/2IW> see paragraph 5.3

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markets, operators have the opportunity to participate in regulatory dialogue on alternative development paths and positive conditions for deployment.

There are a range of network sharing options available, which can be analysed in the context of network providers' different needs:

- Sharing infrastructure at different network levels, from microcells up to whole network 'Internet of Things' (for example industry sector-specific) macro layers.
- Different sharing models in urban and rural markets, where cost structures and coverage areas differ.
- The number of players sharing could depend on the level of cost savings that are required to attract investment participation – in the most extreme case, a single network could be built on which all players in the market gain wholesale access.

In some countries, market players have already started work on network sharing as a separate business model. Tower companies, for example, which have already proved attractive in rural areas, are predicting diversification into urban areas by securing access to lampposts and rights of way for investing in fibre infrastructures.³²

It is recommended that network sharing should become a standard part of the operating model for broadband operators in order to improve the commercial case for many of the expected investments for the future, particularly for 5G. Regulators should engage in sector-wide consultation and if necessary, prepare statutory rules for facilitating network sharing.

Recommendation 4: Construction permits and rights of way

For the civil works typically associated with broadband infrastructure investments (including buildings, manholes, ducts, masts, towers, poles and street cabinets), companies normally have to seek certain permits before construction work can begin. These permits can include access to public or private rights of way, approval of construction details and permissions to carry out civil works.

Typical problems arise in:

- Negotiating wayleaves for access to land and buildings (particularly in the situation of absentee landlords or where there are multi-tenancy buildings).
- Negotiating with local authorities regarding street access and works coordination.
- Accessing existing infrastructure to reduce overall costs.

The survey respondents generally ask for faster, simpler, more transparent and fairer permit-granting procedures. This is true in all markets surveyed.

In some cases, newer market entrants find it more difficult than incumbent operators to obtain permits. This tends to prolong an incumbent's competitive advantage in the market and also disincentivises alternative operators from investing in their own networks where this would be otherwise profitable for them.

The survey participants view this aspect as a major contributor to overall investment risks. Respondents generally agree that procedures should be more transparent and more consistently applied. Charges should be set in relation only to administrative cost and any disputes should be settled by the sector regulator using legally binding resolution and enforcement procedures.

The recommended best practices, in the form of relevant powers, obligations, procedures and coordination are described below.

³² McKinsey & Company "Network Sharing and 5G: A turning point for lone riders"

<https://www.mckinsey.com/~/media/McKinsey/Industries/Technology%20Media%20and%20Telecommunications/Telecommunications/Our%20Insights/Network%20sharing%20and%205G%20A%20turning%20point%20for%20lone%20riders/Network-sharing-and-5G-A-turning-point-for-lone-riders.ashx>

The UK's Digital Connectivity Portal provides practical guidance and resources about building digital infrastructure

In 2018 the UK government established, after public consultation, a “Digital Connectivity Portal” <https://www.gov.uk/guidance/digital-connectivity-portal> that provides resources and advice for local authorities and commercial providers to facilitate deployment of digital infrastructure (full-fibre and mobile networks).

Under the Electronic Communications Code (the UK regulatory framework) operators can be granted “code rights” by Ofcom, the sector regulator. This grants the operator the rights to install, operate, maintain and upgrade electronic communications infrastructure (such as fibre broadband cables) on private and public land. Ofcom publishes a register of operators with code rights.

The code has provisions for calculating the rent to be paid to landowners for hosting equipment. Rent is now calculated based on the value of the land to the landowner rather than the value to the telecommunications company.

It provides a framework for what landowners and network operators should expect from each other when negotiating wayleave agreements and suggests best practice to facilitate positive and productive engagement between all parties, including some practical examples.

If such an agreement cannot be agreed consensually, the operator can apply to the Court to impose an agreement to confer the code rights.

[Extract from the UK government Digital Connectivity Portal

<https://www.gov.uk/guidance/digital-connectivity-portal>]

The coordination of civil works in the EU

The “Directive on measures to reduce the cost of deploying high-speed electronic communications networks” (2014/61/EU)³³, enables any network operator to negotiate agreements with other infrastructure providers for coordinating civil works with a view to deploying high-speed electronic communication networks. It also enables a better coordination of civil works in support of efficient infrastructure.

Additional obligations apply to network operators fully or partly financed by public means; these operators have to meet any reasonable request for coordination of works, provided that it does not entail any additional costs and does not impede control over the coordination of the works.

In order to facilitate coordination, any network operator should make available, upon specific request or via a Single Information Point, the following minimum information related to its on-going or planned civil works:

- the location and type of works*
- the network elements involved*
- the estimated starting date and duration of works, and*
- a contact point.*

[Extract from Digital Single Market policy “Coordination of Civil Works

<https://ec.europa.eu/digital-single-market/en/coordination-civil-works>]

³³ <https://ec.europa.eu/digital-single-market/en/cost-reduction-measures>

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It is recommended that governments and regulatory agencies implement best practice legislation, procedures and on-line capabilities (such as those described above) that will significantly ease the problems associated with providers seeking permits to install broadband infrastructures.

Recommendation 5: The role of the state

Respondents in the three Central Asian markets expressed a number of opinions regarding the proper role of the state in the broadband investment sector. The state's role can be summarised into the following categories:

- The need for clear state policy for the ICT sector with national targets for broadband (see also recommendation 2).
- The level of taxation, spectrum charges and other payments to the state should be consistent with the state's overall ICT policy, with regard to the need for sufficient investments by market players to achieve the policy objectives (see also recommendations 6 and 8).
- A clear legal and regulatory framework needs to be in place for the sector, enforced by an independent regulator. This legal and regulatory framework should be applied fairly, without bias towards operators that are fully or partly state-owned (see also recommendations 1 and 3).
- Effective state-aid mechanisms need to be in place, for example rural development funding or other support measures offered by the state to private investors in order to achieve policy objectives where these objectives cannot be met by commercial investments alone. (See also Recommendation 6).
- Where state investments are used to create national infrastructures, there is a clear danger that the state investments will "crowd out" further private investments. This will weaken competition and could result in an over-dependence on a single infrastructure with the resulting losses in consumer choice and quality of services.

The overall view of respondents is that when government decisions are made that significantly impact the ICT sector (especially sector policy, law and regulation, taxation and spectrum payments), these issues should be discussed with the sector participants so that they can express their views, especially regarding their forward investment planning.

In most markets surveyed there is still a high level of reliance on the existing backbone and copper access networks. Any significant new state investments in new national fibre-based networks, (for example significant additional investment in ICNC ('Netco') in Mongolia could "crowd out" further investments by private operators.

The key role of the state is to establish a clear policy for the ICT sector, within which the investment strategies of market players can have greater confidence. This recommended consultation is particularly important for the broadband sector because any adverse impact on infrastructure investments also spills over onto all other sectors of the economy that rely on ICT services for their development.

It is recommended that governments should involve the private sector in consultations aimed at creating an investment environment that encourages all investments and maximises private incentives. Experience from other countries clearly shows that private participation in broadband infrastructure programmes makes any state ICT policies and public funds used go significantly further. Private involvement also helps to create programmes that are commercially sustainable in the long term, as opposed to ones that continually rely on state aid and other subsidy programmes.

Recommendation 6: State assistance and funding schemes

Regarding the state's role in state aid including universal service mechanisms, survey respondents generally welcome such support provided that the funding is administered in a fair and transparent manner and the state component of the funding supports private sector investments rather than competing with (or "crowding out") private investment.

There are various options for state support for broadband investments:

- State funding to "top up" private investments and ensure there is sufficient incentive for the private sector to invest. The fair and transparent method for the state to allocate this type of

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funding is by a competitive “subsidy auction”, which ensures that the investor offering the most cost-effective solution is awarded the subsidy. This auction mechanism, widely used in the EU, is being used in Mongolia for the very specific case of connecting small villages with high-speed broadband infrastructures.

- Direct state investment in networks that connect outlying regions into a national backbone network. The concept of a state-owned national broadband network has been used for some time in Mongolia, but survey respondents there expressed worries that this state investment would crowd out private investments and duplicate capacity where it is not needed. The proposed use of this type of state operated network is to provide wholesale capacity for use by any retail broadband service provider. The government itself will generally also be a major user of this network for example to connect its own offices and to provide a platform for eGovernment services.
- An alternative to a fully state-funded broadband infrastructure, or “top-up” funds for private investments, is some kind of public-private partnership (PPP) venture that uses both state and private investment for the specific purpose of expanding broadband connectivity to otherwise unprofitable locations. The PPP options include a range of different ownership, funding and governance models. There are no such examples being used in the three Central Asian markets surveyed.

The choice of state funding mechanism from the above options should be supported by relevant laws and regulations, for example a framework and supporting procedures for obtaining construction permits and rights of way. In the Mongolia scheme, the necessary permits are granted along with the funding as part of the contracts between the government and the operators awarded each project. There is however not sufficient clarity about the level of charges faced by the private operators for the use of public assets in constructing their networks, or whether the broadband tariffs will be capped by any universal service regulations.

A key aspect in the choice of any government injection of funds is the potential this creates for distorting competition in the market, including the danger of “crowding out” of private investments. The EU has addressed this issue with a specific set of rules in relation to “state aid for broadband”³⁴. It is also recommended that the legal and regulatory framework adopts a specific set of rules regarding the relevance of state aid for any particular broadband scheme, following the examples already implemented within the EU.

Following the views expressed in the survey, it is recommended that a full range of state-funding options is considered by governments in consultation with the market before decisions are reached. The different options should be tested against full cost/ benefit criteria as well as taking into account the implications of each option on the potential impact on market efficiencies, competition and consumer choice. The chosen model should be piloted in limited geographical areas to gain experience before scaling up into a full national scheme.

Recommendation 7: The availability of digital skills

Respondents in all three Central Asian markets surveyed reported problems in hiring and retaining staff with skills relevant to modern digital networks and services. Typically, there is a reasonable supply of people with the necessary potential, but there is a risk that they will chose to take vacancies in other IT sector companies with local offices, or they will move abroad to find better opportunities. The problem of finding sufficient digital skills in the future is not just a local problem within the broadband sector, most economies are already experiencing digital skills shortages and the demand for well qualified staff with good digital skills is expected to grow further³⁵.

In response to the potential digital staff shortages in the EU, The European Commission is promoting various initiatives aimed at increasing training in digital skills for the workforce and for consumers; modernising

³⁴ https://ec.europa.eu/regional_policy/sources/conferences/state-aid/broadband_rulesexplained.pdf

³⁵ <https://www.weforum.org/agenda/2019/03/the-digital-skills-gap-is-widening-fast-heres-how-to-bridge-it/>

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education across the EU; harnessing digital technologies for learning and for the recognition and validation of skills; and anticipating and analysing skills needs. For example, the EU has plans³⁶ for:

- Master's Programmes in cutting-edge digital technologies developed together with EU excellence centres.
- Short-term specialised training courses in advanced digital technologies for job seekers and employed people especially in SMEs.
- Job placements in companies or research centres where advanced digital technologies are developed or used.

It is recommended that, using the existing channels for co-operation in the telecommunications sector, the issue of digital skills shortages is raised and plans developed for national and regional initiatives for the sector.

Recommendation 8: Aligning the taxation regime with the national objectives for ICT development

This issue is of high concern in Kyrgyz Republic and Tajikistan. In both cases, additional sector specific taxes are imposed on the operators.

In the view of respondents, the high tax burden makes conditions less conducive to investment, risking the achievement of increased mobile connectivity and the sector's wider impact on economic development.

Overall taxation levels, coupled with other sector specific charges such as high spectrum fees (see also recommendation 9), take cash out of the sector that would otherwise have been available for further investments in infrastructure. In this respect, at macro-economic policy level, the aims of promoting ICT are directly contrary to the policy of taking high taxes from the broadband infrastructure and services sector.

The indirect impact of telecommunications/ICT taxation: macro effects

In its 2013 report "Taxing Telecommunications/ICT services", the International Telecommunications Union stated that:

"Analytical research has demonstrated that although the telecommunication/ICT sector tax revenues play an important role in supporting national public services, this role must be weighed against the potentially adverse effects that taxation can bring to the growth of the sector, broadband penetration and national economic growth."

"One of the most interesting and important aspects of the debate concerns a feedback mechanism which is widely considered to be particularly important in application to telecommunications/ICT."

"The feedback works as follows. A government levies a tax on telecommunications. As a result, the roll-out of services is delayed. This has a direct effect on national income, which includes telecommunication/ICT output. However, there is also a spill-over effect. This arises because telecommunication/ICT services are used in many other sectors and can increase productivity there."

"Accordingly, the tax has a broader effect on the growth of national income, and hence on future tax revenues from other sectors."

Extract from "Taxing Telecommunications/ICT Services: An Overview" (ITU 2013)
<https://www.itu.int/en/ITU-D/Regulatory-Market/Documents/Publications/Taxation2%20E-BAT3.pdf>

The survey results support in the following recommendations:

³⁶ <https://ec.europa.eu/digital-single-market/en/policies/digital-skills>

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- Governments should consider whether the apparently low cost of collection of telecommunication taxes is a strong enough consideration to justify a special tax on the sector.
- More weight should be placed on the exceptional macro-economic benefits of investment in broadband infrastructures as sufficient grounds for not taxing them.
- Whether there is a special economic development case for the application of an especially low and advantageous tax rate to facilitate greater investments in specific broadband-enabled projects.

Survey participants placed special emphasis on the second point because there was a general view that national policy makers were not sufficiently aware of the positive and wider economic benefits of broadband infrastructure investments.

Recommendation 9: Ensuring that spectrum resources are used effectively

The survey has supported a general view that restrictive spectrum management policies are in conflict with sector investment needs and in a wider context, to be against the future interests of national economic development.

Respondents in all four countries surveyed expressed the view that operators have paid relatively high sums for new spectrum awards and in addition, have to pay high yearly spectrum fees. In all the markets surveyed, the respondents feel strongly that the investment case for 5G services will be difficult to make, unless there is more certainty about spectrum management policy, especially in the timing and pricing levels of new spectrum releases.

GSMA position on spectrum pricing

“To deliver affordable, high quality mobile broadband services, operators require fair access to sufficient radio spectrum. As a result, governments and regulators carefully manage mobile spectrum, which in turn supports a vibrant digital economy. Sometimes this includes charging a price for access to spectrum to encourage efficient use. However, evidence shows that when prices are too high, consumers can suffer from slower mobile data speeds, worse coverage and slower rollouts.”

1. *High spectrum prices can harm consumers through lower quality mobile broadband services*
2. *Governments should prioritise improved mobile broadband services – above revenue maximisation – when awarding spectrum*
3. *Avoid limiting the supply of mobile spectrum (for example through set-asides), publish long-term spectrum award plans and hold open consultations*
4. *Set modest reserve prices and annual fees, and rely on the market to determine spectrum prices*
5. *Avoid creating unnecessary risks that put operators' current or future services in jeopardy*
6. *Consult with industry on licence terms and conditions and take them into account when setting prices*
7. *Auctions must be well designed and implemented to be an effective award mechanism*
8. *There is no single best approach to estimating the value of spectrum and international benchmarks should be used with caution*
9. *Spectrum pricing decisions should be made by an independent regulator in consultation with industry*
10. *The rise in the total cost of spectrum is a threat to mobile broadband growth – especially 5G*

Extract from GSMA Public Policy Position on Spectrum Pricing May 2021
<https://www.gsma.com/spectrum/wp-content/uploads/2021/05/Spectrum-Pricing-Positions.pdf>

There is a widespread view in the markets surveyed that the spectrum management strategies adopted by governments and regulatory agencies should be better harmonised within the overall context of a wider ICT strategy³⁷. More specifically, modern spectrum management strategies should promote investments in a more liberalised telecommunications market. Broadband infrastructure providers should be able to access spectrum resources in order to facilitate geographical universality, to meet the growth of existing services and to support the expected 5G market transformation.

In planning the release of new spectrum, governments and regulators should recognise that investors need more certainty, for example by ensuring technological neutrality, extending licence periods and by aligning new spectrum release dates.

The charges raised for spectrum should be based on market needs as well as on the need to reflect any remaining spectrum scarcity. Open market consultations, well in advance of spectrum releases, should be used to find the right balance in spectrum charges, recognising the cost pressures faced by operators in meeting national ICT objectives. Similarly, any quality or coverage obligations faced by spectrum holders should be subject to consultation. The general view of survey participants is that service quality and coverage are already subject to, and are best left to, competitive market forces. These competitive pressures are likely to increase when a wider range of 5G-based services become available, so regulatory obligations should be set only at the level required to achieve good investment conditions.

It is likely that in the future, 5G and 'Internet of Things'-based market presence will be considered not only by the traditional network operators, but also by a potentially large number of application-driven, commercial and industrial sector-driven interests.

The potential scope of 5G

"5G is expected to support significantly faster mobile broadband speeds and lower latencies than previous generations while also enabling the full potential of the 'Internet of Things'.

"From autonomous vehicles to smart cities, 5G will be at the heart of the future of communications. 5G is also essential for preserving the future of today's most popular mobile applications – like on-demand video – by ensuring that growing uptake and usage can be sustained.

"5G goes beyond meeting evolving consumer mobile demands by also delivering carefully designed capabilities that will transform industry vertical sectors. 5G introduces a new level of flexibility and agility so the network can deliver customisable services to meet the needs of a huge variety of users and connection types.

"Features like network slicing means industrial sectors can rely on the network delivering precisely what they need – ranging from speed, latency and quality of service to security."

Extract from "5G Spectrum GSMA Public Policy Position July 2019"
<https://www.gsma.com/spectrum/wp-content/uploads/2019/09/5G-Spectrum-Positions.pdf>

³⁷ For example, see <https://londoneconomics.co.uk/wp-content/uploads/2011/09/56-Economic-Impacts-of-Increased-Flexibility-and-Liberalisation-in-European-Spectrum-Management.pdf>

Also <https://www.sciencedirect.com/science/article/pii/S030859611730126X>

Expected technology development horizons:

5G and the Internet of Things connectivity

Enablers:

Advances in cloud and edge computing will increase demand for 5G by driving data-hungry applications including the proliferation of connected devices (around 42Bn connected IoT devices by 2025), increasingly complex devices driving exponential growth of generated data and the demand for real-time analysis, decision-making, and adjustments, for example connected cars/ drones.

Core technologies have become increasingly affordable over the past years (sensors -44% price drop, storage -72% and computing power -57%). This will make several connectivity-driven use cases financially viable.

Barriers:

Inconsistencies in legislative process and content across geographies are likely to create significant barriers to the deployment of 5G.

Lack of demonstrable cost efficiency and return on investment, further complicated by connectivity not being part of R&D plans for manufacturing companies.

Concerns around incompatibility and interoperability of mobile networks when it comes to integrating with existing industrial systems.

Cultural barriers to working with companies in different sectors including telecommunications, as well as start-ups.

Extract from McKinsey analysis "Technology deep dive, industrial Internet of Things"
<https://www.mckinsey.com/~media/mckinsey/Business%20Functions/McKinsey%20Digital/Our%20Insights/The%20top%20trends%20in%20tech%20final/Tech%20Trends%20slides%202%203%204>

What will 5G be used for?

The ITU has outlined specific criteriawhich will support the following use cases:

1. Enhanced mobile broadband, including peak download speeds of at least 20Gbps and a reliable 100Mbps user experience data rate in urban areas. This will better support increased consumption of video as well as emerging services like virtual and augmented reality.
2. Ultra-reliable and low latency communications: Including 1msec latency and very high availability, reliability and security to support services such as autonomous vehicles and mobile healthcare.
3. Massive machine-type communications: Including the ability to support at least one million Internet-of-Things connections per square kilometre with very long battery life and wide coverage including inside buildings.
4. Fixed wireless access: Including the ability to offer fibre type speeds to homes and businesses in both developed and developing markets using new wider frequency bands, massive Multiple-Input-Multiple-Output and 3D beamforming technologies.

Extract from: GSMA report: 'Fixed Wireless Access: Economic Potential and Best Practices' (2018)] <https://www.gsma.com/futurenetworks/wp-content/uploads/2018/08/Fixed-Wireless-Access-economic-potential-and-best-practices.pdf>

The views of respondents on the required spectrum conditions to inform better investment decisions regarding 5G, lead to the following recommendations:

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- Governments and regulators should avoid inflating 5G spectrum prices as this risks limiting network investment and driving up the cost of services.
- Regulators must consult potential 5G stakeholders to ensure spectrum awards and licensing approaches take account of various business models of technical and commercial deployment of 5G services.
- Governments and regulators need to adopt national spectrum policy measures to encourage long-term heavy investments in 5G networks, including long-term licences, a clear renewal process the expected timeframe for future spectrum releases.

One of the barriers to 5G adoption identified in a recent McKinsey report³⁸ is the problem of ‘cultural barriers’ to working with companies in different sectors including telecommunications, as well as start-ups. This barrier is likely to be confounded by the apparent reluctance, expressed in this survey of three Central Asian markets, by the existing spectrum holders (notably mobile telecommunications operators) to accept the need for new market entrants to bid for and obtain future spectrum releases for 5G.

The existing operators typically state their preference for the emerging 5G markets to operate through themselves, rather than be initiated and operated within specific sectors or application areas. If this is the case, then the innovation and speed of the introduction and exploitation of 5G will be slower and opportunities will be missed. This potential barrier can be reduced if policy makers and spectrum regulators adopt a transparent, informative and open market consultation approach, as well as watching other countries’ experiences, before taking decisions about the exploitation of future spectrum capacity.

This points to the need to ensure that new stakeholders are not excluded from applying for and receiving new spectrum releases. Greater participation will promote innovation and ensure that all sectors of the economy can exploit new spectrum capabilities without having to rely only on the traditional holders of spectrum for telecommunications use.

³⁸<https://www.mckinsey.com/~media/mckinsey/Business%20Functions/McKinsey%20Digital/Our%20Insights/The%20top%20trends%20in%20tech%20final/Tech%20Trends%20slides%202%203%204>

5. Glossary of terms used in this report

3G and 4G mobile services	These 3 rd and 4 th generations of mobile technology currently provide the mainstream services in most countries. See also GSM, LTE and 5th Generation mobile .
5th Generation mobile (5G)	5G is the latest generation mobile technology for digital wireless networks that began deployment in 2019 and is expected to become the standard for mobile broadband access with better quality and latency , supporting a further range of high-speed services and applications, in particular the growing “ Internet of Things ”.
Active infrastructure sharing	A form of infrastructure sharing that includes operators agreeing to share available electronic equipment and facilities, including switching, network components, base station equipment, transmitters and receivers. It is normal for each operator to retain separate databases, service management and billing functions.
ADSL	Asynchronous Digital Subscriber Line (ADSL) has been the most prominent existing infrastructure technology for providing fixed broadband access to end users over traditional copper cables in the access network. The achievable performance is dependent on the distance between the premises and the nearest network exchange node. Although in most cases it can provide reasonable quality and broadband capacity, it cannot reach the performance that can now be delivered over optical fibre technology .
ARPU	Average revenue per user – the basic measure of revenue for telecommunications operators. ARPU is calculated by dividing the total revenue from a given service by the number of subscribers to that service. It is normally quoted as a monthly figure – most operators send out monthly bills for their services.
B2B	Shorthand for “business to business.” It refers to the sales companies make to other businesses rather than to individual consumers. Sales to consumers are referred to as “business-to-consumer” or B2C. In the context of this report, the B2B market consists of connecting businesses to telecommunications services including leased line networks and VPNs .
Bandwidth	True internet speeds are measured by a combination of bandwidth and latency . Bandwidth is the amount of data transmitted per second (bps). Typical broadband rates are measured in Megabits per second (Mbps) up to Giga bits per second (Gbps).
Bitstream	A wholesale service provided by an operator as a working broadband fixed connection to customer premises that can be used by another operator to provide a competitive fixed broadband service to the customer. The handover point in the network can be at a local or more remote level. The term Bitstream now generally refers only to non-fibre broadband technologies (notably ADSL). The broadly equivalent term for fibre wholesale access is VULA .

Glossary of terms used in this report

Bluetooth	A short-range wireless technology standard that is used for exchanging high-speed data between fixed and mobile devices over short distances, normally up to around 10 meters.
Broadband services	Telecommunications, media and internet services that are delivered individually or together to consumers and businesses over high-speed access links. The average bandwidth (speed) of broadband services has been steadily increasing and are now available from around 2Mbps (2 million megabits per second) up to Gbps speeds (Gigabits per second) using different technologies.
Broadband infrastructure	Investments in broadband infrastructure take the form of networks to support fixed and mobile broadband services, together with the supporting civil engineering structures and associated equipment. National and international connectivity also includes terrestrial TV and satellite network infrastructures. Of growing importance are investments in new business models linked to connectivity. These growing investments include smart cities, vertical industry sector partnerships, logistics, content, data analytics data and the “Internet of Things”.
Best Practice Index	One of the comparative indexes derived from this survey, which rates each country on a score from zero to 100 based on the respondents’ confidence that the country will adopt best practices in the investment conditions for broadband within a reasonable timescale. A value of zero would indicate that the country has no best practices in the broadband sector. A score of 100 would indicate that the country has already adopted all relevant best practices.
Broadband Market Attractiveness Index:	One of the comparative indexes derived from this survey, which rates each country on a score of zero to 100 based on the respondents’ perception of the pure attractiveness of a broadband market taking account of such factors as market size and growth. On the comparative scale, zero would indicate a perception that the broadband market has no attraction. A score of 100 would indicate a perception that the market potential is perfect.
Broadband Investment Index	See Overall Broadband Investment Index
Broadband Investment Risk Index	One of the comparative indexes derived from this survey, this rates each country on a score of zero to 100 based on the respondents’ perceived barriers to investment. On the comparative scale, zero would indicate a perception that the broadband market has no enabling policy or has other absolute barriers to investment. A score of 100 would indicate a perception that the full implementation of policies, legal and regulatory frameworks and other enabling conditions are already in place leaving no barriers to investment.
Bundled service	See multi-play
Cableco	Shorthand for Cable company; that is a provider of services over Cable networks
Cable networks	This term generally refers to stand-alone networks (separated from traditional telecommunications networks) that were originally established within defined geographical areas to

Glossary of terms used in this report

	provide end users with “Cable TV” services. Using current digital technologies these networks have now been exploited to provide competitive fixed broadband access including voice, internet and media services.
Capex	Capital expenditures, most relevantly (in the context of this report) investments to install and upgrade broadband infrastructures .
CDMA	Code Division Multiple Access, along with GSM , was one of the early standards for mobile network expansion, now superseded in favour of the better quality and higher speed 3G , 4G and 5G/LTE networks.
Cloud computing and storage	The on-demand availability of computer system resources, especially data storage (cloud storage) and computing power, without direct active management by the user. The term is generally used to describe data centres available to many users over the internet. Now predominant, large clouds often have functions distributed over multiple locations.
Critical infrastructures	Critical infrastructure means any system that is essential for providing vital economic and social functions: health, food, security, transport, energy, information systems, financial services, etc. Once these critical infrastructures are defined (on a country-by-country basis) there is a need to prepare special measures to protect networks and services from disruption by both natural disasters and man-made threats (including terrorism, cyber-attacks, disinformation, hostile foreign ownership). Planning and coordination should also take into account the increasing links between sectors and new threats including climate change and pandemics.
Digital dividend	The term “digital dividend” is normally used to describe the benefit from the release of valuable commercial spectrum resulting from the changeover from analogue to digital terrestrial broadcasting. By international agreement, large amounts of spectrum previously used by analogue TV broadcasters should be made available for the expansion of mobile broadband services. Some other outdated technology users may also be blocking spectrum release for mobile broadband growth, for example older military and navigational systems. The transfer of these systems to other bands using better technologies can also contribute to the digital dividend.
DSL	Digital Subscriber Line, the basic upgrade to the copper access network in order to provide digital broadband services to subscribers – see also ADSL
EBITDA	A company’s earnings before interest, tax, depreciation and amortisation. This is a measure of the cash surplus of a company during a defined accounting period because it is calculated by subtracting all expenses except interest, taxes, depreciation, and amortisation from business revenues.
eCommerce	Electronic commerce is the buying and selling of goods and services, or the transmitting of funds, over an electronic network, primarily the internet. These business transactions occur either

	as business-to-business (B2B), business-to-consumer (B2C), consumer-to-consumer or consumer-to-business.
Edge computing	A distributed, open IT architecture that features decentralised processing power, enabling mobile computing and Internet of Things (IoT) technologies. In edge computing, data is processed by the device itself or by a local computer or server, rather than being transmitted to a data centre.
EEC	The collective name given to the Eastern Europe and Caucasus markets surveyed in the current round of EBRD reports.
eGovernment	Electronic government refers to the exploitation of web-based information technologies to improve and enhance the scope, efficiency and effectiveness of service delivery in the public sector.
FDIs	Foreign direct investments.
Fibre access, Fibre to the home (FTTH)	Optical fibre cables providing an infrastructure technology for fixed broadband access to end users giving very high (Gigabits per second) broadband speeds. If the fibre connection continues all the way to users' premises it is generally referred to as FTTH or fibre-to-the-premises (FTTP). If the fibre stops at an intermediate point and continues to the user on an existing copper connection, then it is usually referred to as fibre-to-the-cabinet (FTTC) or fibre-to-the-kerb (FTTK). The generic label used for connections that include fibre is FTTx.
Fixed-mobile convergence (FMC)	This generally refers to the ability of telecommunications companies to provide their subscribers with services that interact with and use both the fixed networks and mobile networks using a single customer device. At its simplest, the customer uses a mobile device installed at a fixed location, by-passing the need for a fixed connection. More sophisticated "seamless" FMC provides a mobile service that roams automatically onto the best available local network, including a mobile broadband signal, fixed wireless, WiFi , Bluetooth etc.
GNI per capita	Gross national income per capita is the monetary value of a country's final income in a year, divided by its population. It is used as an indicator of the relative economic value of markets and spending power of the population.
Green data centres	The market for constructing data centres has grown significantly with increased broadband demand and data usage. Green data centre solutions typically include power from renewable energy resources, cooling infrastructure, energy-efficient equipment, and management systems.
Grey areas	This term is used in the context of broadband network planning to refer to a geographical area of the country where only one operator plans to invest in high-speed broadband infrastructure within a timescale defined by the state policy for achieving universal broadband access. See also White areas .
Grey operators, entities	In the context of this study, grey operators are ones which are not complying with current legal or regulatory requirements for the sector, for example for tax, licencing or regulatory obligations.

	Companies that do comply regard grey operators as unfair and illegal competition.
GSM	The General System of Mobile was the previous standard (that is before 3G , 4G and 5G) used in Europe and adopted widely elsewhere for mobile voice communications and with some very limited data capability.
GSMA	The GSMA is an international body that represents the interests of mobile operators worldwide.
High definition (HD)	High-definition service, normally used to describe better quality visual and media services that can be delivered over broadband networks.
HDTV	High-definition television service.
Infrastructure sharing	A set of practical measures to promote cost reduction in telecommunications networks, including joint construction and ownership of physical infrastructure by operators, joint use and joint operation. The benefits can also be in service quality, rapid network expansion, faster service roll-out, lower environmental impact and greater economic sustainability. The main sharing models are passive infrastructure sharing , active infrastructure sharing and spectrum sharing .
Internet of Things (IoT)	IoT is a concept that predicts pervasive presence in the environment of a variety of things/objects that connect through wireless and wired connections. Unique addressing schemes and high-speed data capabilities are used to interact connected objects and to cooperate with other things/objects creating new applications/services and reach common goals. Applications and sectors that are being developed include smart homes, smart cities, smart grids, industrial/ supply chain/ logistics, connected cars, digital healthcare, smart retail, smart agriculture and many more.
IPTV	Internet protocol television – the technical name given to TV programmes for streaming over an internet (fixed or mobile broadband) connection.
ISPs	Internet Service Providers offering internet usage to fixed and mobile broadband customers.
ICT	Information and Communications Technologies (ICT) covers a range of digital technologies including telecommunications, internet and broadband. The services delivered now includes social media as well visual and print media, eCommerce and eGovernment. ICT infrastructure includes electronic communications networks providing access through higher speed fixed and mobile broadband services.
Intellectual Property Rights (IPRs)	The regulation of IPRs in a variety of sectors relies on the enforcement of patents, trademarks, and copyrights, while consumers can also be assured of quality when they are purchasing products. ICT sector regulators are increasingly being tasked to implement rules that protect copyright and remove pirated content, while at the same time protecting consumer interests and encouraging investment and service innovation within the digital economy.

Glossary of terms used in this report

IP	Internet Protocol, which is the set of rules governing the format of data sent via the internet. In essence, IP addresses are the identifier that allows information to be sent between devices on a network: they contain location information and make devices accessible for communication.
IT	The term Information Technology usually refers to the elements and activities (including hardware, software and labour skills) that exploit computers, storage, networking and other physical devices and processes to create, manage, store, secure and exchange all forms of electronic data. When IT is used in the communications sector (telecommunications, internet and broadband) the term ICT is often substituted.
ITU	The International Telecommunications Union is the United Nations specialised agency for information and communication technologies to facilitate international connectivity in communications networks and technologies and to allocate global radio spectrum and satellite orbits.
Last mile	The term normally used for the part of the network that connects customer premises with a dedicated line back to an operator's local network node. In the past the network was based on copper pair cables (local loops), but most new investments now use fibre-based local access networks. This section of the network remains the most expensive to provide.
Latency	True internet speeds are measured by a combination of bandwidth and latency. Latency is the delay that is introduced by the network between the time of sending the data from one point to receiving it at the next point. Latency is usually measured in milliseconds (ms). It's also referred to (during speed tests) as a "ping rate".
Local Loop Unbundling	A wholesale offering by a network operator to a broadband service provider so that it can provide an end user with fixed broadband service, normally using ADSL technology over the existing copper access (local loop) network. Where fibre access has replaced copper in the network, this wholesale service is now normally called VULA .
LTE	Long Term Evolution is the generic term for the current dominant mobile network standards, superseding 3G . Starting with 4G , LTE is expected to coexist with 5G for some time.
Margin squeeze	An uncompetitive practice used by a dominant network operator where the operator will set its wholesale charges for access to its network at a level that does not allow a competitor wishing to use the wholesale offering to create a competitively priced service in the downstream retail market.
Mbps	Megabits per second – the standard measure used for broadband speeds (bandwidth).
NGNs	Next Generation Networks, generally referring to IP -based telecommunications network architectures that are designed to support high-quality broadband services.
Multi-play	A multi-play or 'bundled' service is an offer to customers that combines several services for a single 'bundled' tariff. High-

	speed broadband connections (both fixed and mobile) are particularly suitable for constructing multi-play offerings. For example, an offering could include voice, internet and audio-visual services with a single tariff structure (sometimes including limits on data usage or voice minutes).
MVNO	Mobile Virtual Network Operator. This is a type of mobile service provider that connects end users via a separate network operator under agreement. The MVNO company provides its own branding on the service and bills the customer. The MVNO then pays wholesale charges to the network operator.
Network slicing	One of the most innovative aspects of 5G architecture, which will let operators provide portions of their networks for specific customer use cases, including separate applications within the “ Internet of Things ” realm — for example the smart home, a factory process, the connected car, or the smart energy grid.
Number portability	A service to consumers whereby they can change their fixed or mobile telecommunications supplier and still keep their existing telephone number. This has been a key aspect in promoting competition because it has removed an important barrier to consumer choice. Number portability is still important in the broadband market because service providers will typically offer ordinary telephone services within a broadband package.
Opex	Operational expenditures, most relevantly (in the context of this report) to run and maintain broadband networks on a year-by-year basis.
Optical fibre technology	The principal means of providing new investment in telecommunications and broadband network infrastructures, including main network digital transmission links and fixed broadband access networks (see also FTTH)
OTT players	Over-the-top players are service providers that offer internet-based applications over the network usually without paying full charges to the network operators. Examples are Skype (and other VoIP (voice-over-internet) brands, which offer very cheap phone calls over the network because the user gains access to the service via the internet.
Overall Broadband Investment Index:	The overall comparative index derived from this survey, which rates each country on a score of zero to 100 for each country surveyed. On the comparative scale, zero would indicate a perception that the investment climate is non-existent. A score of 100 would indicate a perception that the overall conditions are perfect for investment. The Broadband Investment Index is an overall index made up of three component indexes; the Broadband Market Attractiveness Index ; the Broadband Investment Risk Index and the Best Practice Index .
Passive infrastructure sharing	A form of infrastructure sharing that includes operators agreeing to share available physical space, buildings and easements, towers, masts, ducting and power supplies.
PPP	Public-Private Partnerships are joint mechanisms that define financial, ownership and other responsibilities for both government and private enterprise to be involved in a single defined project.

Glossary of terms used in this report

Radio Access Network (RAN) sharing	Radio Access Network sharing is a way for multiple mobile network operators to share radio access network infrastructure. This leads to increased use of the same bandwidth and also improves efficiency by rendering an increased amount network coverage for the sharing operators.
Retail-minus	An approach to wholesale service pricing agreements whereby the operator providing the service must charge less than its own retail tariff so that the purchasing operator has room to make a margin on its retail service. The level of wholesale pricing is normally adjudicated by the sector regulator.
Satellite networks	Satellites in stationary orbit (or low flying orbits) around the earth providing mainly international telecommunications links, mass coverage of satellite TV channels and also some limited internet services to more remote regions.
SEE	The collective name given to the Southern and Eastern European markets surveyed in the current round of EBRD reports.
SEMED	The collective name given to the Southern and Eastern Mediterranean markets surveyed in the current round of EBRD reports.
SMEs	Small to medium enterprises, is a convenient term for segmenting businesses and other organisations that are somewhere between the "small office-home office" (SOHO) size and the larger enterprise. The European Union has defined an SME as a legally independent company with no more than 500 employees.
Spectrum infrastructure sharing	A form of infrastructure sharing that involves operators leasing available spectrum to other operators on a commercial basis. See also Radio Access Network (RAN) sharing .
State-aid rules/ regulations	These are a set of conditions, used by governments, which should be applied when government funds are used to invest or to subsidise (wholly or in part) business investments or operations in a country. The intended principal purpose of the rules is to ensure that state funds do not distort the functioning of an effective market, for example by crowding out (replacing) private investments or by leaving private investments at an unfair competitive advantage. The EU has already implemented a special set of state-aid rules for broadband infrastructure investments that are generally seen as a model also to be used in non-EU countries.
Streaming services	Services that provide on-demand film, TV shows, music and video content over a broadband service for instant viewing, rather than having to download or watch at a particular time when something is broadcast. Streaming services can typically be supported by advertising and therefore free to watch, or by subscription. Examples of popular streaming subscriptions are Disney+, Netflix, Amazon Prime and Hulu.
Telco	Shorthand for telecommunications company (see also Cableco)
Terrestrial TV networks	These networks broadcast the main national and local TV and radio broadcasting channels from fixed ground-based transmitters on behalf of the media organisations that produce

	<p>the programmes. In the last decade, most countries have now carried out a modernisation of their networks to complete the “digital switchover” from analogue to digital terrestrial broadcasting.</p>
Voice over Internet (VoIP)	<p>Voice-over-Internet services, which are offered by brands such as Skype. These carry voice calls “over the top” (OTT) of the network because the caller accesses the service via the internet and not via the telecommunications network exchange. The only fee paid by the user is normally a small call termination fee, which goes to the network operator at the other end of the call.</p>
VPNs	<p>Virtual Private Networks – a specialist service provided by telecommunications companies to large multi-site businesses. Having VPN service means that a business does not have to rent multiple separate leased lines and many of the network management functions previously done by the business customer are now provided within a VPN service by the telecommunications provider.</p>
VULA	<p>Virtual Unbundled Local Access is a wholesale rental service provided by a network operator to a broadband service provider in order for the service provider to serve end users with fibre-based fixed broadband. The forerunner to this wholesale service for copper networks was termed Local Loop Unbundling.</p>
Wayleave	<p>A legal right of way granted by a landowner, generally in exchange for payment and typically for purposes such as the erection of telecommunications street furniture, overhead wires or laying of ducts.</p>
White areas, white zones	<p>This term is used in the context of broadband network planning to refer to a geographical area of the country where no operator plans to invest in high-speed broadband infrastructure within a timescale defined by the state policy for achieving universal broadband access. See also Grey areas.</p>
Wifi	<p>Wireless networks of small reach, which are normally provided in public places so that smart phone users can access internet services without using up their network data allowances.</p>
xDSL	<p>The generic acronym for digital subscriber line services provided over copper access networks, see also DSL and ADSL. Although still used extensively to provide fixed broadband services, new investments in the access networks now generally use optic fibre technology.</p>

Annex: Emerging policy, regulatory and investor lessons from the COVID-19 pandemic

During 2020 and the first half of 2021, the EBRD survey of investor perception has analysed the views of a range of stakeholders in broadband infrastructure investment in a total of 16 countries. The full implications on broadband network investments have yet to emerge, but there is now sufficient evidence to point to certain policy and investment implications that are now being considered for the future.

The main message arising from the survey analysis appears to be that the COVID-19 experience has re-emphasised to policy makers, regulators and investors the importance of greater connectivity with more geographical coverage and better reliability for broadband networks and services.

Much of the survey analysis, together with wider international discussion and case studies, has been in the context of short-term actions for mitigating the impact of the COVID-19 pandemic. The specific themes that enhance broadband infrastructure efficiencies have been highlighted by investors even before the pandemic arose. Conducting the survey during the course of the pandemic has served to underline the importance of taking account of investors' views so that the remaining barriers to broadband investment, which vary to some extent from country-to-country, can be addressed by policy makers and sector regulatory bodies in close cooperation.

Another key issue that has been brought into sharper focus during the pandemic experiences, as reported by the participants in this survey, concerns the lack of clarity regarding critical infrastructures in each country and the required responses to network shocks, failures and security threats (including physical threats from, for example during natural disasters as well as breaches in cyber security).

The key messages arising from the COVID-19 pandemic are best illustrated by the following extracts and case studies.

UN Broadband Commission: COVID-19: Short-term agenda for governments and policy makers/ regulators

At international level, an "Agenda for Action" was adopted during 2020 by the United Nations Broadband Commission for Sustainable Development³⁹. This recommends a set of tangible actions to mitigate the impact of the COVID-19 pandemic and to ease the immediate adverse impacts for economies and societies. Their full recommendations cover the following short-term measures on resilient connectivity, affordable access and the safe use of on-line services.

Resilient and safe connectivity

***Industry and private sector** actions include ensuring connectivity and network continuity, increased bandwidth capacity and network resilience and security, including for vulnerable populations. **Government policy makers and regulators** should relieve network capacity constraints and keep networks running and operational (including decreasing taxes and fees, offering wholesale services, temporarily freeing up additional spectrum which can be immediately deployed, infrastructure sharing, using existing universal service funds, promoting cross border roaming etc).*

Affordable access

***Industry and private sector** actions include in-kind support through donation of ICT services, cloud services, software, equipment and end user devices, support working from home, identify solutions for liquidity and financial shortage to ensure service continuity, offer special tariffs for related health, education, humanitarian and emergency workers, offer free SMS and zero rating for access to health, educational content and government information services. **Government policy makers and regulators** should facilitate delivery of (and remove barriers to) industry commitments and general provision of ICT*

³⁹ <https://broadbandcommission.org/COVID19/Pages/default.aspx>

Annex

services, use universal service funding to support affordable access to health, education, humanitarian and emergency services and people and communities with special needs.

Safe use of online services *Industry and private sector* actions include making available broadcasting capacity for education and health, safe and secured digital platforms, open source software for health, education, food security, financial and governmental services, promote quality education and information content and services; enhance policies against disinformation, increase transparency, provide online training and safe digital tools to parents and teachers to keep children safer online. **Government policy makers and regulators** should provide guidance to consumers and the general population in areas including child online safety, data protection and cybersecurity measures, increase proactive publishing to promote access to information, support learning institutions to conduct distance classes and take actions to foster media and information literacy.

Edited extract from short term actions for resilient and secure connectivity

<https://www.broadbandcommission.org/covid-19-response/>

COVID-19 and its impact on the telecom sector

Subscribers

“Given that a considerable proportion of the global population is still required to work or school from home, subscriptions to broadband and mobile services are more important than ever. The potential stimulus to new device sales from home workers will be reflected in continued growth in the number of mobile subscribers, with additional phones or SIM cards being taken for work-related use.

The need for fixed and mobile broadband services during the lockdown phases of the pandemic resulted in a significant growth in traffic and a shift in consumption patterns. As people stayed at home, they required reliable connectivity for work (videoconferencing and cloud-based applications), remote education, streaming entertainment content, and social media.

The regular workday internet traffic patterns have changed, too. During regular workdays before the pandemic, the traffic peaks used to be concentrated in the evenings. The weekday pattern has now shifted, with traffic flow being more continuous. This change in traffic patterns is likely to remain until the pandemic subsides.”

Infrastructure

“On a local level, telcos and cablecos have increased capex on infrastructure in a bid to ensure that their networks can manage the additional data traffic demanded from customers. Some NGN and 5G upgrade projects have been interrupted by logistical difficulties, usually related to supply chain problems which have prevented telcos from sourcing required equipment, and so having to delay scheduled work and diversify their supply chains.

Issues relating to equipment delivery and sales have had a knock-on effect on telco revenue. Other considerations which have impacted on revenue, have included the provision among many telcos of free services or more generous data packs (usually in relation to distance learning and home-schooling during school closures), as also the dramatic fall in roaming traffic. However, to a degree these negative impacts have been compensated for by an increase in the number of subscribers, and of data use generally.”

Extract from Budde.com September 2021 Report “Telecoms, Mobile and Broadband Statistics and Analysis”

GSMA Intelligence ‘Global mobile trends report’

Navigating the COVID-19 pandemic

“The COVID-19 impact on telecommunications revenue is primarily concentrated in four areas; roaming, due to a lack of international travel; lower handset upgrades due to retail store closures; challenges in corporate and small- medium-sized enterprise (SME) markets, and general consumer spend pressures, particularly in the prepaid mobile segments.

“However, operators’ resilient mobile and fibre networks have met the demands of increased data traffic, spiking to 50-100%. The increases were driven by home entertainment and work from home communications, such as video and voice calls.”

Extract from 2020 GSMA report <https://www.gsma.com/newsroom/press-release/gsma-intelligence-shares-global-mobile-trends-2021/>

Defining and coordinating responses to network shocks, failures and security breaches, especially for ‘critical infrastructures’

The requirement for telecommunications networks to respond adequately to abnormal traffic loading, service interruptions, physical damage and security breaches, including cyber-attacks, has existed before the COVID-19 pandemic. Respondents from Moldova and Armenia stressed the need for better national coordination. In Georgia, a law on critical infrastructures has been used in relation to changes in the ownership of telecommunications assets, which has raised questions regarding the role of the state in protecting critical infrastructures.

Broadband networks, in particular, already play a vital role in connecting governmental organisations, businesses and the public. Any shortcomings in network performance, security and resilience have been exposed during the pandemic as a result of abnormal traffic loads. In some cases, the general quality of broadband services has been exposed as inadequate to support critical sectors during the lockdown, like the emergency services, healthcare and education.

‘Critical infrastructure’ means any system that is essential for providing vital economic and social functions: health, food, security, transport, energy, information systems, financial services, etc. Once these critical infrastructures are defined (on a country-by-country basis) there is a need to prepare special measures to protect networks and services from disruption by both natural disasters and man-made threats (including terrorism, cyber-attacks, disinformation, hostile foreign ownership). Planning and coordination should also take into account the increasing links between sectors and new threats (including climate change and pandemics).

This is a complex area where policy, co-ordination and action preparedness need to be clearly pre-defined. The examples and case studies in this Annex have already highlighted several aspects of the required policy and action responses, including:

-Using policy, regulatory and service provider options for increasing network capacity, including network sharing and wholesale access, temporary spectrum awards, universal service funds, national and cross-border roaming, donation of ICT services to vulnerable entities, free or reduced tariff connectivity for related health, education, humanitarian and emergency workers and free public access to health, education and government information services⁴⁰

...-Defining critical infrastructures and preparing ex-ante supervision arrangements in critical sectors (for example energy, transport, water, health, digital infrastructure, finance sector) plus ex-post supervision for critical digital service providers (on-line marketplaces, cloud and online search engines)⁴¹

⁴⁰ <https://www.broadbandcommission.org/covid-19-response/>

⁴¹ See also https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12462-Protecting-critical-infrastructure-in-the-EU-new-rules_en

-A clear and defined co-ordination role for the sector's response, including the adoption of a set of network and information security measures along the lines of the EU-wide cyber security legislation⁴². This has three parts; defining 'national capabilities' including the need to establish a 'Cyber Security Incident Response Team'⁴³; cross-border collaboration; and national supervision of critical sectors⁴⁴.

The telecommunication industry in the post-COVID-19 world – increasing broadband connectivity

Most innovative models to bring about universal broadband connectivity existed prior to the pandemic. The pandemic has merely reinforced the need to accelerate, scale up or expand them to more geographical contexts. Broadband expansion into non-commercially attractive areas requires extensive cross-sector coordination between diverse organisations with varied vested interests. Examples of such initiatives are:

-The regulatory enforcement of best-practice wholesale access and unbundling procedures to provide a fair and transparent route for new investors to reduce deployment costs.

-Infrastructure sharing including backhaul, ducts, towers, spectrum and last-mile access.

-The creation of specialist companies to offer wholesale facilities including towers and fibre networks.

-Creating open network environments that reduce deployment costs substantially. The concept involves the creation of joint venture telecommunications and platform companies, supported by direct financing instruments.

Summary extracts from ITU report "The telecommunications sector in the post-COVID 19 world:

<https://www.itu.int/en/myitu/Publications/2021/05/11/08/10/The-telecommunication-industry-in-the-post-COVID-19-world>

Exploiting eGovernment for COVID-19 response

By 2020, over 500,000 Mongolians use e-Mongolia to access government-provided services. The timing could not have been better – from November 2020, Mongolia started to see domestic transmissions of COVID-19. E-Mongolia enabled citizens to access services online and have ID cards or passports delivered to their homes during the lockdown.

We also worked to develop and integrate a COVID-19 'test and trace' tool on the platform, so citizens can stay informed of transmission rates in their local area. The launch of the e-Mongolia platform is therefore considered to be one of the major measures against the pandemic.

Extract from: How to build a 'digital nation': Perspectives from Mongolia. Blavatnik School of Government (ox.ac.uk). <https://www.bsg.ox.ac.uk/blog/how-build-digital-nation-perspectives-mongolia>

Prioritising societal broadband connectivity

During the pandemic, as people stayed at home, they required reliable connectivity for work (including videoconferencing), remote education, streaming entertainment content, and social media.

⁴² <https://www.enisa.europa.eu/topics/nis-directive>

⁴³ See: [https://www.ncsc.gov.uk/collection/incident-management/creating-incident-response-team#:~:text=A%20cyber%20security%20incident%20response%20team%20\(CSIRT\)%20consists%20of%20the,the%20nature%20of%20the%20incident.](https://www.ncsc.gov.uk/collection/incident-management/creating-incident-response-team#:~:text=A%20cyber%20security%20incident%20response%20team%20(CSIRT)%20consists%20of%20the,the%20nature%20of%20the%20incident.)

⁴⁴ See [https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/662604/EPRS_BRI\(2021\)662604_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/662604/EPRS_BRI(2021)662604_EN.pdf)

Where governments and private sector investments take place to increase the geographical coverage of broadband services or to upgrade older technology networks for broadband capability, investors have choices in those locations to cover first and those to leave until a later date.

In the case of private investments, the decisions on the timing of projects are normally made commercially by prioritising revenues, so that the areas with the earliest investment returns get served earlier than the higher cost or lower revenue areas. In the case of the public sector, the timing of new infrastructure investments can be decided by including explicit societal objectives. In some cases, private operators are bound by conditions in their licences, for example to serve a high percentage of the population within timescales set by the government.

In most cases, where societal objectives are included, they tend to be generalised and related to broad measures of population coverage. For example, the use of universal service policies attempts to ensure the general affordability of basic services. In the broadband era, where digital services have now become essential for economic efficiency and improved access to vital services, a re-examination of the priorities for broadband investment timings is taking place.

One example from the EBRD 2020/21 survey of the broadband investment sector comes from Mongolia, where public funds are used to promote investments (by both state-owned and private entities) to connect underserved remote villages. In the setting up of projects for investment tenders, the government uses a count of the number of school-age children in each location to set the priorities and therefore the timing of the new broadband infrastructure projects. The introduction of this metric has come about from the COVID-19 experience where most children were cut off from formal education by the closure of schools. Those children in households with no adequate broadband access had to cease formal schooling all together.

In this way, by setting a clear societal objective based on the need to ensure the continuation of schooling, Mongolia has influenced the investment priorities for broadband expansion in a new, more direct way.

How COVID-19 has pushed companies over the technology tipping point— and transformed business forever

“During the pandemic, consumers have moved dramatically toward online channels, and companies and industries have responded in turn.... (with)..... a rapid shift toward interacting with customers through digital channels. They also show that rates of adoption are years ahead of where they were.

“The customer-facing elements of organisational operating models are not the only ones that have been affected. Companies report similar accelerations in the digitisation of their core internal operations (such as back-office, production, and R&D processes) and of interactions in their supply chains. Unlike customer-facing changes, the rate of adoption is consistent across regions.

“When (companies) were asked why their organizations didn’t implement these changes before the crisis, just over half say that they weren’t a top business priority. The crisis removed this barrier:

Extracts from the 2020 McKinsey survey: <https://www.mckinsey.com/business-functions/strategy-and-corporate-finance/our-insights/how-covid-19-has-pushed-companies-over-the-technology-tipping-point-and-transformed-business-forever>

Case studies from European Union countries

France: Ensuring national co-operation

Fortunately, digital networks were able to cope effectively with the sudden and unprecedented increase in digital uses during the first lockdown. However, some content providers experienced overloads, which disrupted access to their services (videoconferencing, eLearning services, etc.) for a short adaptation period.

Following a proactive dialogue involving by the Government and sector stakeholders, ‘heavy’ network users, such as video streaming platforms and online gaming platforms reduced the strain their content put on the network by capping the bandwidth their services required and by scheduling downloads and service updates during off-peak hours.

Stakeholders’ collaboration was efficient in responding to the COVID-19 first “hard” lockdown. For future work, this situation has emphasised the need for close collaboration between national (and European when relevant) ICT stakeholders to increase the ecosystem’s resilience and react promptly to unexpected events that could have an impact on the networks’ traffic load.

Portugal: Better monitoring of complaints

Complaints about electronic communications increased significantly with the COVID-19 crisis during 2020, mainly about service faults, technical assistance, service connection and internet speeds. The sector regulator was able to analyse complaints that were being submitted daily by end users. Based on this, the regulator was able to carry out timely consumer protection during the COVID-19 crisis, including publishing frequently asked questions plus a Consumer Guide about the impact of COVID-19.

As a result, a proposal has been made to Government for the adoption of new legal rules protecting end users from the impact of COVID-19 based on the analysis of complaints. These new rules will question service providers about the measures adopted to address the issues most complained about.

The regulator’s website information guide about the impact of COVID-19 on consumers’ experiences and rights was viewed around 9,000 times. The frequently asked questions webpage was accessed over 55,000 times.

Ireland: Temporary spectrum award

The swiftness and impact of the COVID-19 lockdown measures resulted in significant changes to the normal traffic levels and patterns of electronic communications networks in Ireland. Given increased traffic demands placed on wireless networks, the regulator consulted upon and put in place a licensing framework for the temporary assignment of spectrum rights.

Spectrum rights for an overall period of up to six months were made available to the three mobile operators for rapidly use.

There has been a 67% aggregate increase in data traffic on mobile networks, indicating that the temporary assignment of spectrum rights was an appropriate initiative.

Croatia: Resilience of telecommunications networks

During 2020, Croatia experienced the COVID-19 crisis and two damaging earthquakes. Electronic communications networks showed remarkable resilience, but these crises had a variety of impacts on operators, such as closing points of sale, disrupting the supply chain, increasing the resources needed for customer care, and so on, but the overall impact was limited.

In addition, as a consequence of full or partial lockdowns, there has been a massive shift in traffic from offices, schools, and universities to the home. Work from home via video conferencing, online education for schools and universities, extensive use of online services, and increased use of video streaming and gaming have resulted in unprecedented growth in network usage. The COVID-19 pandemic and the resulting restrictions have highlighted the importance of communications and connectivity of broadband networks.

As a result of this experience, it has been recommended that Croatia adopts an 'Agenda for Action' based on the UN Broadband Commission's recommendations⁴⁵ The medium-term agenda includes a set of high-level actions requiring more coordination among national and international stakeholders:

- 1) Acceleration and implementation of digital cooperation and digital strategies and policies.
- 2) Elevation to the G20 level of resilient broadband networks as a basic right.
- 3) Implementation of agile and flexible regulatory measures to support an inclusive and competitive digital environment.
- 4) Adoption of strategies aimed at promoting universal connectivity by mobilising public and private funding and investment.
- 5) Implementation of streamlined actions and partnerships to promote the expansion of broadband connectivity, digital services, and digital inclusiveness to unconnected communities and populations.
- 6) Promotion of the ongoing importance of connectivity for education, access to information, and online user empowerment through media and information literacy.
- 7) Highlighting of areas where connectivity is playing a key role in the COVID-19 pandemic response and widespread dissemination of these stories to help build better and more resilient societies.
- 8) Identification of major partners for public financing of connectivity to vital services, including schools, and actions to attract institutional finance investors looking for a compelling market opportunity.

Overall lessons from the COVID-19 experience in the EU

The overall resilience of the internet made it possible to cope with the unprecedented increase of traffic on fixed and mobile networks in Europe during the COVID-19 crisis and no major congestion issue occurred.

All national regulators conclude that despite the severity and difficulties introduced by this public health crisis in Europe, they were able to act with considerable flexibility.

Operators were constantly monitoring their networks' ability to cope with the increased traffic and pre-empt capacity shortages, finding solutions proactively in partnership with their associated digital platform service providers, national regulators and governments.

At a time when people were relying much more on electronic communications services and were facing an unprecedented degree of economic and financial uncertainty, operators voluntarily introduced relief measures and new tariff plans to cater to the particular needs of certain consumer groups like doctors or families with schoolchildren.

France, Portugal and Ireland edited case studies from the 2021 draft BEREC Report on COVID-19 crisis – lessons learned regarding communications networks and services for a resilient society:

https://berec.europa.eu/eng/document_register/subject_matter/berec/download/0/9969-draft-berec-report-on-covid-19-crisis-le_0.pdf

Croatia case study: Extract from 2021 World Bank report "Assessment of the digital market in Croatia."

<https://openknowledge.worldbank.org/handle/10986/35541>

Overall lessons edited extract from the 2021 draft BEREC Report on COVID-19 crisis – lessons learned regarding communications networks and services for a resilient society:

https://berec.europa.eu/eng/document_register/subject_matter/berec/download/0/9969-draft-berec-report-on-covid-19-crisis-le_0.pdf

⁴⁵ See: <https://www.broadbandcommission.org/covid-19-response/>

Regulatory coordination role for the response to COVID-19

In the face of the COVID-19 pandemic, the sector regulator in the United Kingdom set itself two key objectives:

- To ensure network resilience and protect critical services.*
- To ensure the networks continued to work well as people moved to work and learn from home, stay in touch with friends and family, and keep themselves entertained.*

To achieve these objectives, the regulator worked closely with network providers and the government to track the measures that they were taking to manage network demands and congestion effectively, where necessary prioritising action required to protect critical services.

The reliability of emergency and healthcare calls was a critical priority. Under the regulatory rules, providers must ensure that emergency calls can be connected at all times, even in challenging circumstances. At the request of the government, the regulator acted to introduce a special '119' number for use as part of the National Health Service's pandemic response programme.

The regulator reinforced its role to keep the UK spectrum free from interference, by prioritising action that protected critical services, such as for power networks. Engineers and technicians were designated as 'key workers' and tasked to keep the airwaves safe and functioning.

The regulator pressed ahead with decisions aimed at promoting investment and competition in fibre networks and the release of more spectrum for 5G services.

Reporting to the regulator, telecommunications providers closely monitored traffic on their networks, and measures were taken by content providers, streaming services, content delivery networks and gaming companies, to mitigate the impact of the increased load on the network.

-Christmas 2020 saw a new peak of internet traffic. Fixed data usage has increased almost 80% in the last two years and lockdowns also saw a shift in how people use their services. Daytime traffic increased significantly. Upload traffic also increased, driven by more use of video calling. Mobile networks also successfully coped with the increased demands and changes in network traffic patterns, including a shift of hotspots from city centres to the suburbs and residential areas.

-The regulator noted that networks had the capacity to meet these demands and stayed well within capacity limits

Summary extract from Ofcom July 2021 report:

https://www.ofcom.org.uk/about-ofcom/annual-reports-and-plans/2020-21-annual-report?utm_medium=email&utm_campaign=Ofcom%20Annual%20Report%20and%20Accounts%202021&utm_content=Ofcom%20Annual%20Report%20and%20Accounts%202021+CID_947445ff15ff9a150556828bb022d55c&utm_source=updates&utm_term=Annual%20Report%20and%20Accounts

This survey was carried out for EBRD by;



Cullen International

<http://www.cullen-international.com>

e-mail: philippe.defraigne@cullen-international.com

Tel: +32 81 25 74 86

Mobile: +32 475 49 38 61

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European Bank for Reconstruction and Development
One Exchange Square
London
EC2A 2JN
United Kingdom

Switchboard/ central contact

Tel: +44 20 7338 6000

Fax: +44 20 7338 6100

Web site: www.ebrd.com

EBRD Legal Transition Team contacts:

Tel: +44 20 7338 6000

Fax: +44 20 7338 6150

Email: ltt@ebrd.com

Web site: www.ebrd.com/law

Information requests: For information requests and general enquiries, please use the information request form at www.ebrd.com/inforequest

Project enquiries:

Tel: +44 20 7338 7168

Fax: +44 20 7338 7380

Email: projectenquiries@ebrd.com