

The Telecom Infra Project (TIP) welcomes the consultation on the White Paper on AI. We thank the European Commission for the opportunity to provide feedback on the Commission's proposed approach.

In particular, we welcome the Commission's approach of encouraging the creation and strengthening of digital innovation hubs to ensure that AI technologies are developed across the EU. Due to the important role of telecoms connectivity in supporting the deployment of AI solutions, we urge the Commission to consider focusing the activities of at least one innovation hub on AI on the telecommunications sector.

We also believe that the Commission should establish a sector dialogue on AI adoption in Smart Cities. When it comes to AI regulation, our core belief is that new legislation should be focused on AI and not overlap or interfere with existing rules and standards. This will ensure that citizens have confidence and trust in AI systems and avoid interfering with the supporting technology stack or established legal framework.

### **What is TIP?**

The Telecom Infra Project (TIP) is a collaborative community evolving the telecom infrastructure that underpins global connectivity to ensure the seamless, reliable, high quality connectivity we need.

Launched in 2016, TIP's mission is to accelerate the pace of innovation in next generation telecom networks by designing, building, testing, and deploying standards-based, open and disaggregated end-to-end solutions. Several hundred member companies and institutions from around the world and from all backgrounds are coming together to build a more vibrant, collaborative telecom ecosystem that delivers solutions. They include hardware manufacturers, software makers, mobile networks, edge service providers, integrators, start-ups and many others involved in the telecommunications supply chain.

TIP has a heavy presence in Europe, with member companies driving initiatives at member state and European levels. Our European members include Telefonica, BT, Orange, Deutsche Telekom, Vodafone, European Space Agency, Nokia, Telenor, Cork Institute of Technology, Ghent University-IMEC, Schneider Electric and SNCF, among others.

A primary focus area of the Telecom Infra Project work is accelerating innovation to help develop new technologies and reimagine the traditional telecommunication network infrastructure by creating end-to-end disaggregated network solutions. TIP has strong relationships with mobile network operators (MNOs) in Europe and is designed to help them build better networks.

### **Digital Innovation Hubs should support AI in telecommunications**

For the EU to lead in the data economy and transformation to an AI-empowered world, it needs to scale up its traditional telecommunications infrastructure. The current highly concentrated telecoms market has enabled wide deployment of mobile networks and wireless connectivity. However, it has also resulted in certain rigidities in telecom equipment markets and in certain cases a lack of interoperability and lack of diversification in the market, which impose costs on MNOs.

We recommend that, in building up a competitive market and robust European capabilities, the Commission consider solutions based on open and disaggregated technologies. Flexibility deriving from network disaggregation allows operators to optimise each component of the network, which will increase their ability to service the European market. Disaggregated technologies make use of

software-defined networking (SDN) solutions, meaning that the use of networks can be optimized and evolved over time, without the need for further infrastructure investment. AI-enabled SDN has the potential to accelerate this evolution, delivering even greater returns on investment in disaggregated networks.

Due to the importance of connectivity for Europe's digital future, and the potential of AI to improve the functioning of networks, we believe that a Digital Innovation Hub should be devoted to AI in telecommunications.

**Smart Cities should be part of the AI sector dialogues.**

We welcome the Commission's suggestion to initiate sector dialogues on AI uptake with key sectors. We suggest that the Commission initiate a sector dialogue on Smart Cities. Many AI applications can be deployed in a Smart City environment. This means that they can be easily tested, individually or in combination, and evolved as required. Successful deployment at an urban scale will facilitate the roll out of AI solutions into lesser-populated areas, in particular by building an understanding of the connectivity requirements of AI solutions and the cloud/edge infrastructure to support them. Through our various Project Groups, we are developing best practice and guidelines for different Smart City applications.

**Final remarks**

TIP looks forward to working with the European Commission on the implementation of AI initiatives and to promoting together an open, fair, diverse, competitive and trustworthy ecosystem.

We are available should you require additional information or clarifications.

Yours sincerely,

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