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Subject: State aid N 304/2010 – Programa Avanza Nuevas Infraestructuras de Telecomunicaciones - Spain

Madam,

I. SUMMARY

- (1) I am pleased to be able to inform you that the European Commission has assessed the measure "*Programa Avanza Nuevas Infraestructuras de Telecomunicaciones*" and decided not to raise objections as the State aid contained therein is compatible with Article 107(3)(c) Treaty on the Functioning of the European Union (TFEU).

II. PROCEDURE

- (2) With a letter notified on 7 July 2010, pursuant to Art. 108(3) of the TFEU, the Spanish authorities informed the Commission of their intention to adopt a national plan to rollout broadband infrastructure in Spain. This information was complemented by an additional submission dated 11 and 27 August 2010. A request for information was sent on 27 October 2010 and the reply was submitted by the Spanish authorities on 4 November 2010. Further clarifications were submitted by email on 26 and 29 November 2010.

Excma. Sra. Dña. Trinidad JIMÉNEZ
Ministra de Asuntos Exteriores
Plaza de la Provincia 1
E-28012 MADRID

Commission européenne, B-1049 Bruxelles – Belgique
Europese Commissie, B-1049 Brussel – België
Teléfono: 00-32-(0)2-299.11.11.

III. DESCRIPTION OF THE MEASURE

Factual background

- (3) The Plan Avanza is a package of initiatives launched by the Spanish authorities to foster Information Society. It includes five macro-areas of implementation: training, digital contents and services, development of the telecommunication sector, infrastructures, security. The implementation of the above initiatives is shared between the central government, autonomous regions and municipalities. In particular, the central government and the regions have entered into cooperation agreements setting forth the guidelines applicable in the implementation of the phases of the Plan. In this respect, the Ministry of Industry has set up a coordination centre, in order to monitor the execution of the various projects.
- (4) In the framework of the Plan Avanza for all the abovementioned areas, the Spanish authorities have developed a part of the Plan Avanza specifically designed to finance new broadband infrastructures. In order to increase digital connectivity and stimulate economic progress with new infrastructural resources, the Plan Avanza provides for the investment of EUR 400 million over two years, with the aim of both bridging the existing digital divide as far as basic broadband is concerned and to build NGA facilities in areas where private investment alone does not suffice.
- (5) The notified measure is an amendment and a prolongation of a similar scheme currently into force, previously approved in the procedure N 73/2008¹. However, while the latter scheme included investments in broadband together with other infrastructures (mobile communications and digital terrestrial television), the notified measure specifically focuses on investments in broadband. On the basis of the experience gained with the implementation of the existing aid scheme, together with the fundamental technological shift due to the development of Next Generation Networks, the Spanish authorities intend to amend the scope of the measure. Other measures (aid to mobile communications and digital terrestrial television) will still be implemented under the existing scheme.
- (6) Indeed, the Plan Avanza has two objectives translated into two lines of action: *Technical Solution A*: extending to the entire Spanish population resident in white areas, broadband services of at least 1 Mbp/s (this being the minimum requested speed, while the preferred speed for many projects will be 2 Mbps, the current scheme grants only 256 Kbps) *Technical Solution B*: creating the conditions for the deployment of NGA with speed higher than 50 Mbp/s in NGA white areas.

Objectives of the measure

- (7) The notified measure aims at bringing broadband connectivity in municipalities, particularly in rural and low-density areas, which are currently facing an infrastructure and connectivity deficit. In relation to the classification in white, grey

¹ Commission Decision of 17 June 2008, C(2008)2662 final:
http://ec.europa.eu/community_law/state_aids/comp-2008/n073-08.pdf.

and black areas set forth by the *Community Guidelines for the application of State aid rules in relation to rapid deployment of broadband networks*² (hereinafter: "Broadband Guidelines") the Spanish authorities will direct their broadband investments in the white areas where broadband is not available. In relation to Technical Solution B, they will take initiatives aiming at the deployment of NGA in NGA white areas, where broadband is not sufficient to meet the needs of business operators.

- (8) The identification of the areas eligible for public intervention, in the context of both Technical Solutions A and B, has been carried out through a **public consultation** involving operators of electronic communications and other stakeholders. In particular, in March 2010, information requests were addressed to the main operators of electronic communications, to the autonomous regions and to all interested parties, in order to verify the existence of any planned investment in broadband. The National Regulatory Authority has also had knowledge of the notified scheme from the beginning of its planning and had the opportunity to express its views³. The consultation has had the two-fold objective of verifying (i) the effective absence of the basic broadband infrastructure, and (ii) the intention of the operators to invest in broadband connectivity in the short term (three years). Such mapping exercise has determined the final pattern of the network to be funded.

The public consultation with the stakeholders

- (9) In the process of designing the aid measure, the Spanish authorities have launched a public consultation⁴, in order to verify the current status of availability of broadband and NGA infrastructures and to learn about the operators' investment plans.
- (10) With respect to Technical Solution A, a public consultation has been launched in order to draw a map of broadband white areas which would be eligible for investment in new infrastructure. The results of such consultation will be published on the web portal "Ayudatec" of the Ministry of Industry.
- (11) A similar public consultation has also been launched in relation to Technical Solution B, in order to locate NGA white areas. The Ayudatec portal will publish the reports of municipalities where FTTH, HFC or xDSL infrastructures are already in place or where their deployment in the following three years is expected. Based on such information, a map for the public intervention will be finalized.
- (12) In relation to the above consultations, Annex 2 to the notification ("*Perspective analysis of the situation of the provision of broadband services: preliminary identification of areas of implementation*") provides some preview data and details as to the coverage of various broadband technologies installed on the Spanish

² OJ C 235 of 30.9.2009, p. 7.

³ According to the Spanish authorities, no formal opinion has been issued on the notified measure.

⁴ See the consultation at the website <http://www.mityc.es/telecomunicaciones/es-ES/Participacion/cerradas/Paginas/Infraestructuras.aspx> . Replies have been submitted, inter alia, by Colt Telecom, Distecable, Iberbanda, Nubitel, ONO, Orange, R, SPTE and Vodafone.

territory: fix broadband, mobile broadband, x-DSL (at least 1 Mbp/s), UMTS/HSDPA (3,5 G), WIMAX (at least 1 Mbp/s), HFC (cable modem) and FTTH.

Design of the project

- (13) As seen, upon completion of the mapping exercise, the Spanish authorities envisage two types of initiatives. The first solution (*Technical Solution A*) entails the set up of a broadband infrastructure in broadband white areas. The second solution (*Technical Solution B*) will consist of initiatives aiming at the deployment of very high speed broadband in NGA white areas.

Technical solution A

- (14) In the first place, the Spanish authorities envisage the rollout of a local access broadband infrastructure (where possible, associated to additional connection links to the backhaul network) to serve "white" areas. Such infrastructure should ensure a connectivity speed of at least 1 Mbp/s. Besides that 1 Mbp/s is the minimum requested speed, the preferred speed for the projects to be selected will be 2 Mbp/s.
- (15) Since several initiatives are already in place in the framework of the existing Avanza Programme, both at central and at regional/local level, to achieve the objective of adequate broadband coverage for rural and remote areas, [the Spanish authorities have drafted an inventory of such existing initiatives and will implement the present scheme in such a way as to make sure that the same project will not benefit from multiple aid schemes.⁵

Technical solution B

- (16) The Spanish authorities envisage also initiatives aiming at creating the conditions for the deployment of NGA infrastructures which have a download speed of above 50 Mbp/s. In particular, this initiative will only cover NGA white areas, where no broadband exists or where broadband might be available but not to an extent sufficient to address the needs of business and residential customers (with exclusion of white NGA areas which are traditional black areas). Such initiatives will be undertaken and carried out in compliance with the same pro-competitive principles envisaged for Technical Solution A.
- (17) In order to ensure the uniform coverage of the territory, the aid scheme provides for the possibility that a limited number of projects be initially approved per each region. Where aid is granted for the building of NGA backhaul networks, it would be possible that the "last mile infrastructure", which is connected to this NGA backhaul network, is either basic broadband or NGA. The latter is always permitted, as "Technical Solution B" only covers NGA white areas. On the other hand, basic broadband connections are only permitted in white basic broadband areas.

⁵ Details of the inventory of existing initiatives and of the coordination mechanism are contained in Annex 3 to the notification.

- (18) For both Technical Solutions, the project expressly foresees that **existing infrastructures** will be used wherever available for the deployment. To this aim, the Spanish authorities have put in place a number of regulatory and administrative instruments to facilitate operators' access to existing infrastructures and obtainment of rights of way. A specific office will be set up by the managing authority to coordinate actions for this objective.
- (19) The set up of the infrastructure will be adjudicated by **public tenders**. The mechanism and the award criteria are the same as those already used for the existing aid scheme N 73/2008⁶. Preference will be given to the operator requesting the lowest amount of aid.
- (20) **Effective Wholesale Access** will be granted at all possible levels, including access to ducts, the cable network and bit-stream. The ducts used for the deployment of the network (comprising both existing and newly built ducts) will be made available to other operators interested in posing their own infrastructure. Where the building of ducts is supported, operators have to install multi-fibre ducts.
- (21) As regards **access wholesale prices** for the subsidized infrastructure, they will be based on the average published (regulated) wholesale prices that prevail in other comparable, more competitive areas of the country or the Community or, in the absence of such published prices, on prices already set or approved by the National Regulatory Authority for the markets and services concerned. In this respect, the Spanish authorities have clarified that, not being available any published prices for broadband access services yet, the prices taken as a reference will be those set by CMT with respect with the operator with significant market power. In addition, the CMT will be granted powers to regulate access at fair prices.
- (22) The measure is **technologically neutral**, as the participation in the tender is not limited to the use of a particular technology. Different platforms, including mobile and satellite networks, are eligible if tender requirements are met (both mobile and satellite operators have already lodged applications for aid under Technical Solution A). Further all telecommunication operators, regardless of the technology employed, will have access and use the infrastructure and the network access facilities.
- (23) A **claw back mechanism** is foreseen to ensure that any profit generated via the subsidized network in excess of the costs will be paid back to the Member State. Indeed, in order to make the mechanism effective and assess possible extra-profits, all costs for the construction and management of the infrastructure shall be included in a business plan and shall be in line with those borne by an efficient operator for the realisation of a similar project. To ensure prompt recovery of the extra-profits, the contract with the beneficiary shall include a clause mandating the repayment of a share of the extra profits in proportion to the aid intensity. Furthermore, every year, a financial statement shall be drafted outlining the revenues and the costs associated to the infrastructure and its operation.

⁶ See above footnote 1.

- (24) In summary, the project to set up a broadband infrastructure envisages that already existing infrastructures be used for the installation of cables and other equipment; that any solution adopted be technologically neutral; that all infrastructures be accessible to third parties at fair, reasonable and non discriminatory terms and that tender procedures be employed in order to adjudicate the necessary works.

Legal Basis

- (25) The legal basis for the measure is the Draft Order ITC/2148/2010 of 30 July 2010 which regulates the investments and the related tender procedures for the aid measure Avanza New Telecom Infrastructures for 2010. Such order is grounded on the more general National Plan on Scientific Research, Development and Technological Innovation 2008-2011.

Other characteristics of the measure

- (26) The **budget** for the measure amounts to EUR 400 million over a two-year period. The measure will take the form of non-interest bearing (*i.e.* with a 0% interest rate) loans to be repaid in a maximum term of fifteen years, including a maximum three-year grace period. The aid will amount to a maximum 35% of all eligible costs but cannot be higher than the profitability gap for a similar long-term project not needing aid. The budget is equally split between the Technical Solution A and B. As a consequence of the scheme, the infrastructures realized will belong to the undertakings benefitting from the notified scheme.
- (27) While in the measure N 73/2008 previously authorised, the aid intensity was 50%, in the present scheme the **intensity** of the public funding will not go above 35% of all the eligible costs.
- (28) The **duration** of the aid covers the period 2010-2011. In particular, subject to the Commission approval of the aid scheme, the loans can be granted beginning from July 2010 until 31 December 2011.
- (29) **Beneficiaries.** With respect to both technical solutions, the direct beneficiaries of the aid will be the electronic communication operators which will gain access to capital resources to build the infrastructures at lower cost than they should have faced otherwise. Moreover, third party electronic communications operators and firms and businesses located in the targeted areas will indirectly benefit from the possibility of purchasing broadband access at lower costs than those entailed by existing market solutions.
- (30) **Monitoring.** The project measure envisages the adoption of a monitoring scheme capable of capturing the costs incurred for the realization of the subsidized project. In addition, the CMT (Spain's Communication Authority) will monitor the prices applied by the operators for the third-party access to the financed infrastructure.

IV. STATE AID ASSESSMENT OF THE MEASURE: PRESENCE OF AID

- (31) According to Article 107(1) of the TFEU, “*any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods shall, in so far as it affects trade between Member States, be incompatible with the common market*”. It follows that in order to be qualified as State aid, the following cumulative conditions have to be met: 1) the measure has to be granted out of State resources, 2) it has to confer an economic advantage to undertakings, 3) the advantage has to be selective and distort or threaten to distort competition, 4) the measure has to affect intra-Community trade.
- (32) The current measure will be financed by State resources, namely from resources set aside in the budget of the Kingdom of Spain (Ministry of Industry, Tourism and Trade).
- (33) It will provide selective economic advantage to the electronic communication operators selected via the tender procedure and also for third party electronic communication operators that will be able to offer their services via wholesale access to the subsidised network. There will be also an advantage for the businesses located in the targeted areas.
- (34) The measure has the potential to distort competition. At the level of network operators, support given to one operator may discourage other competitors to deploy or expand their own networks in the targeted areas. Distortion of competition could also arise at the level of business customers of the broadband network: public funding could encourage local undertakings to subscribe to the services offered via the subsidized network instead of more expensive market-based solutions. Insofar as the intervention affects providers of electronic communications services from other Member States and distorts competition between end users located in Spain and elsewhere in Europe, the measure has an effect on trade. The markets for electronic communication services are open to competition between operators and service providers, which generally engage in activities that are subject to trade between Member States.
- (35) Therefore, as laid down in paragraphs 10-16 of the Broadband Guidelines, the Commission considers that the scheme constitutes State aid within the meaning of Article 107(1) of the TFEU.

V. COMPATIBILITY ASSESSMENT

- (36) The Commission has assessed the compatibility of the scheme according to Article 107(3)(c) of the TFEU and in the light of the *Community Guidelines for the application of State aid rules in relation to rapid deployment of broadband networks*⁷ (hereinafter the "Broadband Guidelines").

⁷ *Community Guidelines for the application of State aid rules in relation to rapid deployment of broadband networks*, OJ C 235, 30.9.2009, p.7.

- (37) The Broadband Guidelines contain a detailed interpretation of Article 107(3)(c) of the TFEU in this area of State aid law. As regards the applicable substantive provisions, the Commission has essentially analysed the measure in the light of the criteria developed in particular in paragraphs 31-51, 73 and 79 of the Broadband Guidelines.

The balancing test and its application to aid for broadband network deployment

- (38) As described in points 34 and 35 of the Broadband Guidelines, in assessing whether an aid measure can be deemed compatible with the common market, the Commission balances the positive impact of the aid measure in reaching an objective of common interest against its potential negative side effects, such as distortions of trade and competition.
- (39) In applying this balancing test, the Commission will assess the following questions:
- a. Is the aid measure aimed at a well-defined objective of common interest (*i.e.* does the proposed aid address a market failure or other objective)?
 - b. Is the aid well designed to deliver the objective of common interest? In particular:
 1. Is the aid measure an appropriate instrument, *i.e.* are there other, better placed instruments?
 2. Is there an incentive effect, *i.e.* does the aid change the behaviour of firms?
 3. Is the aid measure proportional, *i.e.* could the same change in behaviour be obtained with less aid?
 - c. Are the distortions of competition and the effect on trade limited, so that the overall balance is positive?
- (40) The individual steps of the balancing test in the field of broadband are set out in detail in Sections 2.3.2 and 2.3.3 of the Broadband Guidelines.

Objective of the measure

The aid is in line with the Community policy

- (41) The current measure targets "*white areas*"⁸, where adequate broadband and/or NGA infrastructure is currently not available and where, based on the findings of the public consultation launched by the Spanish authorities, there are no plans by private investors to roll out such infrastructures in the near future. Hence the objective of the measure is in line with paragraphs 37-40 of the Broadband Guidelines, by extending broadband coverage to such unserved areas, the Spanish authorities pursue genuine cohesion and economic development objectives.

⁸ See paras 41 and 42 of the Broadband Guidelines.

- (42) Furthermore, in the context of the financial and economic crisis affecting severely the European economies, it was recognised by the Commission⁹ that broadband investments can be considered as "*smart investments*" that are able to provide short term (employment)¹⁰ benefits and long term (economic) advantages for the EU economies. Hence by accelerating broadband deployment, the current measure is also in line with the European interest to support fast recovery of the European economies.¹¹

Aid is the appropriate instrument

- (43) As set out in paragraphs 47 and 48 of the Broadband Guidelines, in the situation currently under assessment, despite efforts undertaken by the Spanish authorities through alternative instruments, private investments have taken place in the targeted areas only to a limited extent. Without further public intervention, reducing the "*digital divide*" between rural and urban areas seems not possible, which could lead to the economic and social exclusion of the local citizens and undertakings. Hence in the current situation, State aid is an appropriate instrument to achieve the set objectives.

The aid provides the right incentives to operators

- (44) As set out in paragraph 50 of the Broadband Guidelines, regarding the incentive effect of the measure, it needs to be examined whether the broadband network investment concerned would not have been undertaken within the same timeframe without any State aid. According to the results of the public consultation and market research referred to above in paragraphs (9) and subsequent, in the targeted areas no investment would take place without public funding within three years, hence the aid produces a change in the investment decisions of the operators. Moreover, as explained in paragraph (19), the partners for the setup and operation of the network will be selected by public tender. The measure aims at creating an infrastructure essential for the provision of a wide array of advanced services. Its result, therefore, will be to attract to rural areas additional investments by undertakings active in a number of heterogeneous industries and stimulate them to offer high value added services exploiting the broadband infrastructure.

Design of the measure and the need to limit distortions of competition

- (45) As set out in paragraph 51 of the Broadband Guidelines, in assessing the proportional character of the notified measures in "white" areas a number of necessary conditions has to be met in order to minimise the State aid involved and the potential distortions of competition:

⁹ Brussels European Council, 19/20 March 2009 Presidency Conclusions.

¹⁰ See also Katz et al. (2009) in the paper of "*The Impact of broadband on jobs and the German economy*" estimate that broadband network development within the framework of the National Broadband Strategy of Germany could create 407.000 jobs between 2010 and 2014 as a result of network construction and network externalities.

¹¹ Communication from the Commission to the European Council: *A European Economic Recovery Plan*, Brussels, 26.11.2008.

- (a) *Detailed mapping and coverage analysis, consultation with stakeholders:* the Spanish authorities have undertaken an analysis of the existing broadband infrastructures in order to clearly identify the areas where state intervention is necessary. By consulting existing operators and updating the target areas accordingly and by consulting with all the relevant stakeholders (such as the National Regulatory Authority) in an open and transparent manner, the Spanish authorities ensure that public funds are used only in areas where it is necessary and limit the possibility of crowding out private investments and distortion of competition to the minimum possible.
- (b) *Open tender process* the Spanish authorities will select the undertakings which will benefit from the aid for the construction, the operation and the maintenance of the network through open and transparent competitive procedures, with the application of the principles and safeguards provided for by the rules on public procurement (see paragraph (19) above). Open tender procedures are considered to be effective means to minimise the aid necessary for the measure.
- (c) *Most economically advantageous offers:* within the context of an open tender, the Spanish authorities will select the most economically advantageous offers among those presented by the operators. Pursuant to the Broadband Guidelines, the awarding criteria are established in the call for tender and include: lowest price, most innovative solutions, timing and maintenance. At similar quality conditions, the bidder with the lowest amount of aid requested should receive more priority points in the assessment of its bid.
- (d) *Technology neutrality:* The current measure does not favour any particular technology or network platform leaving it to commercial operators to come up with the most appropriate technological solutions to provide broadband services to end users.
- (e) *Use of existing infrastructures:* as described in paragraph (18), the Spanish authorities will ensure that during the tender procedure existing civil infrastructures are considered by the bidders in the design of their offers. Moreover, coordination with other civil works shall be taken into account by the tenderers in order to limit the use of public funds. Existing regulatory obligations and a specific public body in charge of coordinating access and rights of way¹² will ensure that incumbents are not unduly favoured.
- (f) *Wholesale access:* the operator of the new network will provide open wholesale access to all interested parties in an open, transparent, non-discriminatory manner for at least seven years. In case of projects falling in the scope of *Technical Solution B*, the access obligation will also apply to passive infrastructures. The CMT will also monitor the compliance of operators with their access obligations.
- (g) *Price benchmarking:* In order to ensure effective wholesale access and to minimise potential distortion of competition, wholesale prices on the subsidized network will be benchmarked on wholesale prices approved by the CMT for the operator with significant market power, as explained in paragraph (20) and will

¹²

See above paragraph (18).

be monitored by the National Regulatory Authority with the objective to offer similar access prices to those charged in non-subsidised areas in conformity with paragraph 51(g) of the Broadband Guidelines. Price benchmarking is an important safeguard to ensure that the aid granted will serve to replicate market conditions like those prevailing in other competitive broadband markets.

(h) *Monitoring and claw-back mechanisms to avoid over-compensation:* the project will be examined on a regular basis and the monitoring mechanisms implemented will ensure that if the beneficiary fails to comply with the rules, the granting authorities will be in the position to recover the aid granted. Furthermore, by ensuring that any extra profit generated through the operation of the networks will be clawed back (see paragraph (23) above), the Spanish authorities ensure that the recipient of the aid will not benefit from overcompensation and will minimise *ex post* and retroactively the amount of aid deemed initially to have been necessary.

(46) ***Additional conditions for NGA networks:*** As far as Technical Solution B is concerned, additional conditions have to be met, as laid down in paragraph 73 and 79 of the Broadband Guidelines for the authorisation of aid measures to NGA networks, the Spanish authorities proved the following:

- (a) To the extent the measure aims to support the deployment of an NGA network in "white NGA areas", where one basic broadband network may already exist (traditional "grey area") the Spanish authorities will only grant the aid in the areas where the existing network is not sufficient to satisfy the continuously growing needs of citizens and business users in the area in questions and that no plans for an upgrade have emerged during the public consultation. Given the current lack of adequate networks, no less distortive means (including *ex ante* regulation) are available to reach the stated goals.
- (b) *Effective wholesale access:* under the current scheme the access obligations imposed on the chosen operator include effective access to both passive (such as ducts, dark fibre) and active infrastructure, as detailed in paragraph (20), without prejudice to any similar regulatory obligations that may be imposed by the NRA in the specific market concerned in order to foster effective competition.
- (c) *Role of the NRA:* In the case at hand, the Spanish regulatory authority CMT has been consulted on the project. In the phases of implementation of the programme, CMT will have the competence to supervise compliance with the agreed access conditions and will approve access tariffs whenever necessary.
- (d) *Effective and full unbundling:* The NGA network architecture that will benefit from State aid will support effective and full unbundling and satisfy all different types of network access that operators may seek (including access to ducts, fibre and bitstream).

Conclusion

- (47) The Commission concludes that the compatibility criteria set out in the Broadband Guidelines are met, hence the aid involved in the notified measure is compatible with Article 107(3)(c) of the TFEU.

VI. DECISION

- (48) On the basis of the foregoing assessment, the Commission has accordingly decided to consider that the aid measure "*Programa Avanza Nuevas Infraestructuras de Telecomunicaciones*" is compatible with Article 107(3)(c) of the TFEU and not to raise objections to it.
- (49) The Spanish authorities are reminded that, pursuant to Article 108(3) of the TFEU, they are obliged to inform the Commission of any plan to extend or amend the measure.
- (50) If this letter contains confidential information which should not be disclosed to third parties, please inform the Commission within fifteen working days of the date of receipt. If the Commission does not receive a reasoned request by that deadline, you will be deemed to agree to the disclosure to third parties and to the publication of the full text of the letter in the authentic language on the internet site:
http://ec.europa.eu/eu_law/state_aids/state_aids_texts_en.htm .
- (51) Your request should be sent by encrypted e-mail to stateaidgreffe@ec.europa.eu or, alternatively, by registered letter or fax to:

European Commission
Directorate-General for Competition
State Aid Greffe
Rue Joseph II 70
B-1049 Brussels
Fax No: +32 2 2961242

Yours faithfully,

For the Commission,

Joaquin ALMUNIA
Vice-President