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Subject: **State aid SA.34732 (2012/N) – Italy**
 BULGAS – FIBERSAR –NGA Sardegna

Sir,

I. SUMMARY

- (1) I am pleased to be able to inform you that the European Commission has assessed the measure SA.34732 (2012/N) 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)¹.

II. PROCEDURE

- (2) By letter registered on 3 May 2012, pursuant to Article 108 (3) of the TFEU, the Italian authorities notified the above mentioned measure to the Commission. Additional information was requested by the Commission on 3 July 2012 and submitted by the Italian authorities on 30 July 2012.

¹ With effect from 1 December 2009, Articles 87 and 88 of the EC Treaty have become Articles 107 and 108, respectively, of the TFEU. The two sets of provisions are, in substance, identical. For the purposes of this Decision, references to Articles 107 and 108 of the TFEU should be understood as references to Articles 87 and 88, respectively, of the EC Treaty where appropriate.

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III. CONTEXT

- (3) To overcome the digital divide affecting its population and territory, in recent years the Sardinia Region has undertaken a number of initiatives aiming at the technological upgrade of the existing telecommunications networks where market operators' own initiative was lacking. In particular, since 2006 the Region financed the upgrade of the local exchanges which allowed to bring DSL services to over 100 municipalities affected by digital divide². In parallel, the Region rolled out its own public network (RTR) connecting the offices of the regional public administration. The Region also adhered to the 2009 national framework project to build backhaul networks in underserved rural areas³.
- (4) However, the abovementioned interventions did not address the issue of the copper "last mile" access segment. The Italian authorities submit that the existing copper network has in fact reached its physical limits in capacity terms and the incumbent operator faces high maintenance costs due to the infrastructure obsolescence. In light of the need to obtain a higher bandwidth to take the advantage of innovative services for public and private operators (digital school, use of digital cultural heritage, digital health, e-inclusion, e-democracy, digital TV of high definition, teleworking and remote collaboration) and in line with the 2020 European Digital Agenda and the national strategy, the regional authorities of Sardinia consider it necessary to intervene to favour the rollout of ultra-fast Next Generation Access (NGA) networks in its territory.
- (5) It is well known that the most significant obstacle to the rollout of NGA networks is the high costs for civil works which represent up to 65-70% of the total investment costs needed. For this reason the Italian authorities intend to seize a unique opportunity to minimise such costs: the planned construction of the gas distribution network ("BULGAS") across the regional territory. Since civil works will be carried out for the purpose of the gas infrastructure, they can be used also to the benefit of a telecommunication infrastructure project ("FIBERSAR").
- (6) The Italian authorities expect that the synergies from combining the two projects BULGAS and FIBERSAR will generate consistent cost savings, enabling the final users (citizens and enterprises) to obtain lower connection costs and better quality of service. In addition, by taking advantage of the favourable technological setting – including the creation of the public RTP network and the on-going upgrade of the backhaul segments – in the view of the Italian authorities, this project represents a unique opportunity to facilitate the rollout of a network open to different topologies and able to substantially contribute to the objectives of the Digital Agenda.

IV. DESCRIPTION OF THE MEASURE

- (7) ***Objective and design of the measure.*** The Italian authorities aim at facilitating the rollout of a Fibre to the Home (FTTH) network by exploiting the synergies with the parallel construction of a gas distribution network. Originally thought as a network for use by the public administration, the Italian authorities have decided to extend the scope of the network and make it available for connecting also citizens and business.

² Authorised by the Commission with Decision in State aid case N 222 / 2006 - Digital Divide in Sardinia.

³ Authorised by the Commission with Decision in State aid case N 646/2009 - IT - National broadband plan for rural areas in Italy.

- (8) However reaching 100% FTTH coverage goes beyond the means available to the regional government, hence the measure will cover the following activities:
1. laying of ducts in concomitance with the civil works undertaken for the gas distribution network (BULGAS project) to the benefit of all users connected to the latter;
 2. Connection of all public interest points into a Public Telematic Network (called RTP) targeting primarily the sites of the local public administration and schools (i.e. covered also by the BULGAS intervention);
 3. laying of dark fibre to facilitate NGA deployment for 50% of the population as the initial target;
 4. management, maintenance and extension of the infrastructure including the public network RTP, the ducts and the dark fibre by a wholesaler operator.
- (9) The BULGAS project, whose tender has already been published, will allow the realisation of civil works (ducts, mini tubes, manholes, and drops) to be kept in public ownership and used for the rollout of an NGA network. The network topology will support both FTTH point-to-point (P2P) and FTTH point-to-multipoint (PON) architectures and will be sized to cover a minimum of 240.000 users and potentially up to 400.000 users.
- (10) The parallel FIBERSAR project will allow the rollout of the public fibre-based network RTP connecting 5000 public administration sites as well as of the basic NGA infrastructure to serve residential and business users, using fibre connection or hybrid solutions (fibre-copper-radio).
- (11) In a subsequent phase, a wholesaler will be selected to manage and maintain the network, in particular by (1) offering services to the public administration via the RTP, by directly providing the service or by giving wholesale access to other operators and (2) activate the NGA network for the commercial market in order to achieve the objectives of a) providing services of above 30 Mbps to the whole Sardinian population and b) above 100 Mbps for at least half of the residential users and 100% of the business users.
- (12) The Italian authorities claim that the "wholesaler" format is the most pro-competitive: as the selected operator will not be linked to telecoms operators, this set-up will incentivize their investment in the activation of the publicly funded network downstream. To strengthen this feature, the Italian authorities pointed out that if a telecom operator is selected as wholesaler – whether individually or as a member of the winning consortium – it will have to commit to create a specific branch to operate on the wholesale level, separated from its retail business.
- (13) **Legal basis:** Article 30 of Legislative Decree 6 July 2011, n. 98 "Disposizioni urgenti per la stabilizzazione finanziaria" converted with amendments in Law 15 July 2011, n. 111, Deliberation N. 25/18 of 1. 07. 2010.
- (14) **Budget, financing instruments and duration:** The estimated overall cost of the measure concerned is: 82.975.200 Eur. The aid takes the form of a direct grant. Financial means will be obtained from EU funds "European Regional Development Fund" (ERDF) and from national and regional funds. The scheme will be in place as of July 2012 until 31 December 2013, but not before obtaining Commission's authorisation. The infrastructure will become operational on 31 December 2015.

The aid cannot be cumulated with aid received from other local, regional, national or EU schemes to cover the same eligible costs.

- (15) **Beneficiaries:** The direct beneficiaries of the aid will be the electronic communications operators and the concessionaire of the infrastructure. Indirect beneficiaries include third operators gaining access to the subsidised infrastructure.
- (16) **Detailed mapping:** The regional government conducted a thorough analysis of the broadband market and elaborated a detailed mapping of the areas exhibiting market failure. On the basis of this analysis and of the results of the public consultation, the Italian authorities submit that the whole regional territory can be considered white NGA in the meaning of the Broadband Guidelines. As regards the National Regulatory Authority's analysis of the areas where infrastructure competition is considered sustainable, the Italian authorities submit that the areas targeted by the present measure (i.e. those in which the gas distribution network is being rolled out) consist of small and medium municipalities in which infrastructure competition was not sustainable even in the basic broadband scenario, while sustainability as regards NGA competition is doubtful even in bigger municipalities in the Region.
- (17) As regards the availability of basic broadband, 95 of the concerned areas are "white" and no broadband services of minimum 2 Mbps are offered. In all other areas one basic broadband infrastructure is present, in some cases with more operators offering services via local loop unbundling.
- (18) **Consultation with stakeholders:** As mentioned above, the regional government carried out a public consultation to identify clearly the areas to be targeted by the intervention and to gather the position of the interested parties on the project. The results of the public consultation, showed that:
- No operator has plans to invest into NGA ultra - broadband infrastructure in the near future of 3 years;
 - The following telecommunications operators i.e. WIND, Vodafone, Telecom, Tiscali, Fastweb, expressed their interest to acquire rights of use on telecommunication infrastructures to offer ultra – broadband services, if those infrastructures are realised from the Public Administration;
 - All the areas potentially targeted by the BULGAS intervention can be considered NGA white areas.
- (19) The National Regulatory Authority AGCOM was also consulted by the Italian authorities and delivered an opinion on the project on 18 June 2012. AGCOM made a number of recommendations which the regional government committed to implement in the project.
- (20) **Technology and infrastructure:** Due to the specific features of the notified measure, involving the exploitation of synergies for civil works, the Italian authorities intend to take full advantage of the opportunity and rollout a fibre network reaching the premises of the end-users. However, the project only covers the passive infrastructure and therefore it is open to different technological choices. In particular, the funded NGA network will enable both network architectures FTTH P2P and FTTH – PON and will be open for use by any operator wishing to connect the equipment of their choice for the provision of services to the end-users.
- (21) **Open tender:** The aid is allocated on the basis of an open tender process and will be carried out by the Regional Administration. The tender will be awarded on the basis of the characteristics of the ducts infrastructure rollout as well as of the dark fibre in relation to the number of users, to the most economically advantageous offer. The

award criteria will include: (1) effectiveness and efficiency of the project as regards the public RTP network (number of public administration sites connected on top of the minimum required, the interconnection with existing public networks, timing and conditions of the connectivity on offer to the public administration), (2) effectiveness and efficiency of the project as regards the NGA infrastructure (expansion of the network, number of users served, better timing, lower profit margin), (3) quality of service, (4) use of existing infrastructures, acceleration in the activation phase, level of the wholesale price below the maximum ceiling. The winning bidder will provide services to the public administration via the RTP in return for the right to commercially exploit the publicly funded infrastructure.

- (22) ***Use of existing infrastructures:*** As described above, the use of the existing infrastructure, in particular the gas distribution infrastructure, is not only a feature of the present project but the main reason to plan such kind of intervention.
- (23) ***Wholesale offer:*** After the concession agreement is stipulated with the Region, owner of the infrastructure, the selected operator will be responsible for the maintenance and the management of the infrastructure. As its core business, for the duration of the contract – 20 years – the selected operator will make available dark fibre at wholesale level to any access seeker, at fair and non discriminatory conditions. Moreover, for the same period of time, the concessionaire will give access to ducts and cabinets – within the limits of their capacity – and will ensure full and effective unbundling of the subsidised infrastructure.
- (24) ***Price benchmarking:*** As regards price benchmarking, the access fees will be set following criteria of fairness and transparency. The pricing principles established by the National Regulatory Authority will be followed. In addition, one of the advantages of the project is that due to its specificities and on the cost savings allowed by the re-use of the gas distribution civil works, the wholesale prices may be especially favourable compared to a greenfield situation. The Region, or a delegated public entity, will carry out annual market analyses in order to verify the price levels prevailing on the market.
- (25) ***Claw-back mechanism:*** The project foresees the inclusion of a claw back mechanism: the extra profits made by the selected operator on top of a level identified in the tender documents will have to be reinvested in the expansion of the reach of the network. To allow the recovery of possible extra profits, the concessionaire will present a detailed financial plan indicating revenues and costs which will be supervised by an independent authority.
- (26) ***Monitoring:*** To carry out the monitoring of the concessionaire's compliance with the project specification as well as to implement the claw-back mechanism, a specific authority (most probably a regional independent entity) will be established. Each member of the authority will be appointed according to criteria of independence and transparency. The monitoring will cover:
 - a) ***Strategic approach:*** the monitoring authority will evaluate the strategic targets that the Concessionaire will carry out as regards its activities and the performance of the services provided in the medium and long run.
 - b) ***Quality of the services and business performance:*** The monitoring authority will verify quality of service and performance by the concessionaire every 6 months, also in the case of operators' and users' complaints.

c) *Extra profits, activations, tariffs and other obligations:* The monitoring Authority will verify the respect of all the obligations which formed the subject of the tender, including the activation rate and the non discrimination obligation.

- (27) To enable the monitoring authority to perform its task, the concessionaire will be obliged to keep separate accounts as regards the activities entrusted to it in relation to the Sardinian network.

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

- (28) 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 internal market”. It follows that in order to be qualified as State aid, the following cumulative conditions have to be met: the measure has to be granted out of State resources, it has to confer an economic advantage to undertakings, the advantage has to be selective and distort or threaten to distort competition, the measure has to affect intra-Community trade.

State resources

- (29) The FIBERSAR project is going to be publicly funded by EU resources (ERDF) which are allocated at the discretion of the national authorities, as well as national and regional resources. Hence state resources are involved.

Selective economic advantage

- (30) The public intervention is liable to alter the existing market conditions. It will provide a selective economic advantage to the concessionaire prevailing in the tender as well as to all third party providers who will use the new infrastructure.
- (31) The Italian authorities submit that as regards the public RTP network, the measure does not create any advantage because the beneficiaries (public administration bodies) are not exercising an economic activity and therefore, in line with existing practice, is not to be considered State aid and does not need to be assessed by the Commission in the present case⁴.
- (32) As regards the use of the NGA network on the commercial market, for which the Commission's approval is requested, the Italian authorities submit that, in their view, an advantage may exist only with respect to the commercial users benefitting from the funded network. By contrast, in the Italian authorities' views no advantage exists at the level of the mere rollout of the broadband network because it takes place at the same time as the civil works undertaken for the rollout of the gas distribution infrastructure, thus falling into the lines indicated in paragraph (61) of the Broadband Guidelines (intervention not restricted to a specific sector) and outside the scope of article 107(1) TFEU.
- (33) It is the consistent Commission position that notwithstanding the use of an open tender process, the selected operator will receive financial support which will

⁴ The Commission has already accepted in the past that the fact that a public authority builds its own public-sector network to satisfy its needs for Internet connectivity (instead of procuring such services from private operators) does not entail an economic advantage for the beneficiaries since they do not exercise an economic activity. See for example, Commission decisions in cases NN24/2007, Prague Municipal Wireless Network, OJ C/141/2007, N46/2007 Welsh public network scheme, OJ C/157/2007, Commission Decision of 11.08.2010 N 407/2009 - Optical fibre Catalonia (Xarxa Oberta).

enable it to provide broadband services at conditions not otherwise available on the market. The state support allows the operator to offer end-to-end services *prima facie* at lower prices than if it had had to bear all costs itself and thus attract more customers than under normal market conditions. Moreover, State measures supporting the deployment of broadband networks are selective in nature in that they target broadband investors and third operators active only in the telecommunications markets. In the present case, even if the public intervention is also addressed to the gas distribution sector, this is not sufficient to take away the selectivity element. While paragraph (61) of the Broadband Guidelines foresees that under certain circumstances, civil works of public authorities might not constitute State aid, but rather a general measure, if they are not industry or sector specific, it should be noted that the constructions works foreseen by the framework aim at civil works carried out specifically for the provision of broadband services and for the individual operator chosen as concessionaire as explained above. Therefore, the design of the measure is such as to aim at the benefit of an industry or a sector and falls with the scope of article 107(1) TFEU.

Distortion of competition

- (34) The public intervention alters the existing market conditions by allowing the provision of improved broadband services by the selected electronic communication operator and, potentially, third party providers. Furthermore, the measure will alter the conditions of competition between end users who are likely to subscribe to the very high speed broadband services in the targeted areas and end users elsewhere in Italy and the EU. Therefore, the fact that an improved broadband service becomes available has the effect of distorting competition.

Distortion of trade

- (35) Insofar as the intervention is liable to affect providers of electronic communication services from other Member States, 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.
- (36) 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.

VI. ASSESSMENT OF THE MEASURE: COMPATIBILITY

VI.1. The balancing test and its application to aid for broadband network deployment

- (37) As described in paragraph (34) and (35) of the Broadband Guidelines, in assessing whether the measure can be deemed to be compatible with the internal 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.
- (38) 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, 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?

(39) 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 referred Broadband Guidelines.

VI.2. Objective of the measure

The aid is in line with the policy of the Union

(40) The scheme is in line with the European Union's policy to bring broadband to all Europeans. The Italian authorities aim to achieve the objectives of the Europe 2020 strategy and of the Digital Agenda for Europe⁵ of providing by 2020, (i) all Europeans with access to internet speeds of above 30 Mbps and (ii) 50% or more of European households subscribing to internet connections above 100 Mbps.

(41) The publicly funded infrastructure will reach citizens, enterprises and the public administration. Moreover, by coordinating their intervention with the civil works taking place for the rollout of the gas distribution network, the Italian authorities aim at achieving considerable cost savings which will be passed on to the users of the network by means of lower prices to have access to a new, state of the art and future-proof broadband network.

(42) By improving broadband access for citizens and businesses in those areas of Sardinia where there is a lack of ultra – broadband infrastructure, the measure helps achieving great cohesion and is therefore in line with the common interest.

The aid provides the right incentive to operators

(43) 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 without any State aid. According to the results of the public consultations referred to above in paragraph (17), in the targeted areas no investment in NGA would take place without public funding, hence the aid produces a change in the investment decisions of the operators. Therefore, the aid provides a direct and appropriate investment incentive for the selected operators.

VI.3. Design of the measure and the need to limit distortions of competition

⁵ OJ C 245 of 19.5.2010.

- (44) The Italian authorities have designed the measure in such a way as to minimise the State aid involved and potential distortion of competition arising from the measure. The measure at stake meets the proportionality conditions set out in paragraph (51) of the Broadband Guidelines:

a) Detailed mapping and coverage analysis, consultation with stakeholders: As set out in detail in paragraph (16) and □, the Italian authorities have undertaken a mapping exercise to identify the areas at market failure which should be targeted by the State intervention. By consulting stakeholders and upgrading the targeted areas accordingly, the Italian authorities ensure that public funds are used only in "white NGA areas", i.e. areas where NGA infrastructures are not present and will not be developed by private operators in the next three years. As such, the Italian authorities ensure that the aid is given only 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 Italian authorities will select the undertakings for the construction and the management of the network through open, transparent and competitive tender procedures in full compliance with national and EU public procurement rules. The organisation of the tenders and the subsequent operation of the network are explained above in paragraph (20). This procedure has the effect of maximising the effect of the aid provided while minimising any potential advantage granted for the selected operator.

c) Most economically advantageous offer: Within the context of an open tender procedure, the Italian authorities will select the most economically advantageous offer among those presented by the operators. Pursuant to the Broadband Guidelines, the awarding authorities specify in advance in the calls for tender the relative weighing of the qualitative criteria chosen.

d) Technology neutrality: As explained above in paragraph (19), the measure in question aims at the deployment of an NGA network. Due to the specific features of the notified measure, the Italian authorities take full advantage of the opportunity to rollout a fibre network reaching the premises of the end-users. To ensure technological neutrality, the measure will only cover the rollout of the passive infrastructure and therefore it is open to different technological choices. In particular, the funded NGA network will enable both network architectures FTTH P2P and FTTH – PON and will be open for use by any operator wishing to connect the equipment of their choice for the provision of services to the end-users.

e) Use of existing infrastructures: As mentioned above, the re-use of existing infrastructures is not only a feature of the notified measure but represents its main core.

f) Effective wholesale access: As explained in detail in paragraph (22), the selected operator (i.e. the wholesaler) will offer for 20 years the wholesale use of the infrastructure to retail operators requesting access, in a fair, transparent and non – discriminatory manner.

g) Price benchmarking for wholesale prices: In order to ensure effective wholesale access and to minimise potential distortion of competition, wholesale prices on the subsidised network will be based on the pricing principles approved by the NRA, taking into account the specific feature of the project, in terms of cost-savings,

which may result in lower prices for operators obtaining access to the network and ultimately for end-users.

h) Claw – back mechanism and monitoring: The project will be examined on a regular basis and a monitoring mechanism will be implemented as explained in paragraph (25). Possible extra-profits will be reported and will have to be reused for further expansion of the network as explained in paragraph (24).

- (45) For those of the targeted areas which could be considered black areas from the basic broadband point of view, in line with paragraphs (77) and (78) of the Broadband Guidelines, the Italian authorities demonstrated that, despite the competitive situation in the basic broadband markets, it is highly unlikely that the market will by itself develop the right incentives to upgrade to NGA networks.
- (46) In particular, the Italian authorities demonstrated that according to the results of the public consultation, no operator is interested in deploying an NGA network, not even in such a favourable situation such as the concomitance of the civil works for the gas distribution infrastructure. Moreover, as regards the investment patterns of the commercial operators, the Italian authorities have indicated that the latest infrastructural investments in the region only took place thanks to the initiative of the public authorities. Conversely, commercial operators only undertook less demanding investments such as upgrade of some central offices in the most populated area of the region.
- (47) Finally, concerning the conditions laid down in paragraph (79) of the Broadband Guidelines, the Italian authorities proved that the following are met:
 - (a) The selected operator will provide third parties with effective wholesale access for more than seven years. In particular, the access obligations imposed include the right to use ducts, dark fibre and street cabinets. This is 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 or measures adopted after the expiry of that period.
 - (b) As detailed in paragraph (18), the Italian authorities consulted the NRA. The NRA will continue either to regulate ex ante and to monitor very closely the competitive conditions of the overall broadband market and impose where appropriate the necessary remedies provided by the applicable regulatory framework.
 - (c) As detailed in paragraph (19), 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, on an open wholesale basis and the deployed NGA network will support both "point-to-point" and "point-to-multipoint" networks topologies.

VI.4. The distortions of competition and the effect on trade are limited, so that the overall impact of the measure is positive

- (48) The subsidised broadband infrastructure offers only wholesale access services to third parties, not retail services, thus as explained in footnote 57 of the Broadband Guidelines, the likely distortions of competition are further reduced as such a network management model helps to avoid access discrimination.

- (49) On balance, the Commission concludes that the overall effect of the measure is deemed to be positive. The measure is in line with the objectives of Article 107(3)(c) TFEU as it supports the achievement of the DAE objectives. The intervention is designed in a way that does not distort competition or adversely affect trading conditions to an extent contrary to the common interest.
- (50) The Commission notes that the public intervention will be able to ensure a significant improvement in terms of broadband availability because considerable new investments in the broadband network will be undertaken by the selected bidder and the subsidised infrastructure will bring such new capabilities to the market in terms of broadband service availability and capacity that are not provided and would not be provided by the market on commercial terms in the near future of three years.

VI.5. Conclusions

- (51) On the basis of the foregoing the assessment, the Commission's analysis confirms 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.

VII. DECISION

- (52) On the basis of the foregoing assessment, the Commission has accordingly decided that the aid measure "BULGAS-FIBERSAR – NGA Sardegna" is compatible with Article 107(3)(c) TFEU.
- (53) The Italian 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.
- (54) 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/competition/elojade/isef/index.cfm>.
- (55) Your request should be sent by registered letter or fax to:

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State Aid Greffe
Rue Joseph II 70 / Jozef II straat 70
B-1049 Brussels

Fax No: +32 2 29 61242

Yours faithfully,

Joaquín ALMUNIA
Vice-President

