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Digital Networks Act: Consultation

Creating the digital infrastructure of the future

10 July 2025

Executive Summary

Europe's competitiveness is under severe pressure. The EU has fallen behind the USA and China in terms of growth, productivity and innovative strength. Against this background, German industry has very much appreciated the attention to digital infrastructures attributed by the European Commission through the White Paper "How to master Europe's digital infrastructure needs", the Letta Report and the Draghi Report. The assessments correctly describe the status quo of digital infrastructures in terms of facing investment challenges, the need to stay resilient and technologically future-proof. They rightfully acknowledge the need for a streamlined, simplified and more harmonised regulatory approach to digital networks, with the ultimate goal of achieving the Digital Single Market, which was also highlighted in the Letta Report. They also rightly identified the low profitability of the electronic communications sector and the resulting inability to fund the substantial investments required for modernizing the digital infrastructure as a key problem that has to be addressed. BDI fears that if these issues are not swiftly addressed, Europe's communication infrastructure will not enable European companies to develop and utilise the digital solutions, such as AI and quantum computing, necessary for maintaining European industry's global competitiveness. For example, AI-driven innovation is set to revolutionize our entire way of life, and the investment needed to prepare properly will be significant. Part of this investment will be to build the physical infrastructure underpinning the AI revolution.

Recognising the importance of digital networks for European industry's competitiveness as well as access to state-of-the-art and secure connectivity, able to address the most advanced needs of consumers and industries alike, the Digital Networks Act (DNA) should not only introduce ambitious simplification and harmonization but also foster further innovation in the sector.

In a nutshell: Evaluation of the Commission's proposed measures

- **Simplification:** An ambitious reform of the current regulatory framework is essential for the upcoming DNA — including a shift towards horizontal consumer protection law, aiming towards an overall more coherent and simpler regulatory framework. Moreover, to facilitate the rollout of gigabit networks, the Commission should cut unnecessary red tape and overly bureaucratic requirements as well as facilitate cross-border services. This includes reducing information and reporting obligations, streamlining authorisation procedures and preventing gold-plating at the national level.

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- **Spectrum:** A future-proof spectrum policy should strengthen coordination while preserving national flexibility. The Digital Networks Act must promote timely and predictable spectrum allocation. To foster investment, German industry calls for indefinite spectrum licenses or at least longer license durations with default prolongation mechanisms, and allocation proceeding conditions that prioritize network rollout and spectrum efficiency over revenue-maximization for the EU Member States (MS). Furthermore, the "use it or lose it" principle should be applied fairly across spectrum holders, the availability of frequencies must be safeguarded, and additional bands with different propagation characteristics should be made available in a timely manner.

  Additionally, cross-border interferences and restrictions should be addressed jointly by the Commission and all Member States through bilateral and multilateral negotiations and a level playing field for satellite networks should be ensured.

- **Copper switch-off / Access Regulation:** German industry finds that setting a binding EU-wide copper switch-off date at this stage would not be appropriate, even with derogation mechanisms, as it is overly ambitious and neglects objectively diverging network and service characteristics across MS. A mandatory copper-switch off could lead to increased costs, a reduced deployment speed in some MS as well as to the shutdown of functional infrastructure at the expense of increasing costs for customers. The policy objective of fully shutting off the copper networks should be achieved via measures supporting and facilitating the fiber roll-out.

  Additionally, German industry warns against the introduction of a pan-EU harmonised access product that applies to all operators, irrespective of their dominance, as the structural complexity of broadband markets and the availability of well-functioning commercial access products raise concerns regarding the practicality and added value of a harmonised EU-wide access product. Instead, this may weaken infrastructure competition as market entry without investments would be facilitated.

- **Support framework:** To facilitate the significant investment needed for the transformation of the EU's connectivity industry a simplified and more coordinated infrastructure-related support framework is needed. This would lead to a more efficient usage of resources – in terms of finances as well as personnel in both public institutions and private industry – resulting in enhanced connectivity for society and industry. Current programs, such as the IPCEIs, are often inefficient and overly bureaucratic

- **Resilience**: The current fragmented approach to cybersecurity regulation undermines collective security objectives while imposing unnecessary burdens on infrastructure operators and investors. German industry strongly supports consolidated regulatory frameworks that reduce administrative complexity while maintaining robust security protections.

- **Competitiveness as a policy objective:** The revised EU telecom framework should address the recommendation from the Draghi report to reflect competitiveness in the set of policy goals. Widespread availability of secure and advanced connectivity infrastructure is crucial for the EU's overall competitiveness and digital ambitions vis-à-vis other world regions and therefore should be recognised at the legislative level.

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Simplification

i. Reduce existing reporting obligations (up to 50%), remove unnecessary regulatory burdens and re-focus Universal Service obligations on affordability aspects

German industry strongly welcomes the proposed reduction in reporting obligations and the removal of unnecessary regulatory burdens. An urgent and ambitious reform of the current regulatory framework with the upcoming DNA is needed. To put it in Mario Draghi's words, we should be "increasing legal certainty and reducing regulatory and administrative burden by ensuring that there are fewer, clearer, more fit-for-purpose, future-proof and coherent rules." Since the telecommunications sector is highly regulated, the European Commission should reduce outdated, unnecessary red tape and overtly bureaucratic requirements, improving framework conditions for investment in digital infrastructures. Moreover, the inter-linkages between various sector-specific as well as horizontal European (e.g. consumer law, data laws, cloud or cybersecurity law) and national regulatory approaches must be thoroughly assessed and fully considered when modifying the regulatory framework. Concretely, it is necessary to delete those overlapping sector-specific obligations that can be better covered by the horizontal legal framework, such as consumer law. Infrastructure-based competition must remain a cornerstone of the legal framework, enabling different infrastructure providers to coexist and compete, while at the same time safeguarding innovation as well as continuous and efficient investments in infrastructure. Parallel infrastructures also create a resilient digital backbone that enables industrial processes to continue operating even in the event of crises and when under attack.

Additionally, affordability is no longer an issue due to a very low price level for basic services. Also, the issue of availability has declined drastically due to mobile and fixed network deployment. Taking this into account, the Universal Service Obligation should be replaced by targeted public subsidies ensuring availability in those few local cases without basic connectivity (e.g. public vouchers), as this would address the remaining cases more targeted and efficiently while ensuring the investment capacities of the telecom sector.

We further encourage the Commission to consider aspects of existing harmonization efforts which have not led to the degree of consistency across MS that was originally intended. In BDI's experience, the implementation of the European Electronic Communications Code (EECC) diverges significantly between MS, including on general authorizations, security of networks, quality of service, and access to emergency services and public warnings.

With regard to reporting obligations, the current cybersecurity regulatory framework requires companies to report significant security incidents affecting an essential or important entity (cf. Article 23 NIS 2 Directive), and actively exploited vulnerabilities in products with digital elements (cf. Article 14 CRA). While the former must be reported to the national competent authority or CSIRT in each Member State, the latter must be reported to both the relevant national CSIRT and to ENISA via ENISA's reporting mechanism. Telecommunication operators, for example, must navigate and report incidents under twelve different pieces of EU legislation, including NIS2, DORA, CRA, and GDPR, each with varying requirements, thresholds, and reporting timelines. If the same cybersecurity incident might also affect data protection and privacy or affects financial IT systems, additional reporting obligations may arise under GDPR and DORA. German industry urges the European Commission, the European Parliament and all EU Member States to standardise definitions, reportable items, timelines, thresholds, reporting authorities, and tools (such as platforms and templates), and to operate a common reporting mechanism ("1-stop-shop") which enables companies to fulfil all their reporting obligations emanating from the CRA, the NIS 2 Directive, GDPR, DORA and sectoral regulations. We also welcome the

announcement of a review of the Cyber Security Act and the future Digital Package. This could significantly reduce the administrative burden for operators of telecommunication networks without any negative implications for the cyber resilience of their networks

We also call on the Commission to consider removing the regulation of termination rates via phasing out the relevant Delegated Regulation, as the current safeguard cap (0,2 cent) is already part and parcel of daily business practices and therefore phasing out of the Delegated Regulation will not have any negative impact.

Finally, telecommunication companies are subject to a significant number of data delivery and transparency obligations with regard to network coverage and rollout. NRAs and other authorities collect detailed network-related information, establish data repositories with varying degrees of public access and develop information tools. In light of the current appreciable market dynamics - including noticeable investment dynamics, extensive network rollout activities in urban and rural areas, infrastructure-based competition, and customers benefitting from enhanced competition and choice through informed decision-making - the fundamental question arises as to whether and to what extent an increasingly refined transparency as well as state-led analysis and planning tools are necessary and beneficial. There is, however, concern that this creates monitoring bureaucracy and administrative burdens with questionable effects on further accelerating network expansion and achieving the goals of the digital decade. Extensive simplification and reduction of transparency obligations and information requests vis-à-vis companies are necessary. Articles 20, 21 and 22 EECC should be streamlined into leaner provisions for information requests, with general principles such as limiting data queries to the necessary scope and clearly defined purposes. Proportionality and coherence in annual reporting obligations need to be ensured. Data collection and transparency on critical infrastructures require sensitive and balanced handling. If information requests are still necessary, they must serve a limited set of specific objectives (e.g., identifying local bottlenecks, monitoring national broadband targets).

ii. Merge various directly related legislative instruments into the DNA (e.g. EECC, BEREC Regulation, Open Internet Regulation, Radio Spectrum Policy Programme)

German industry believes that, considering the mutual relationship between the objectives of BEREC, the EECC, Radio Spectrum Policy Programme and Digital Decade targets, it is important for the future DNA to have a comprehensive and consolidated approach for communications networks.

iii. Introducing a simplified authorisation regime and a reduced and more harmonised set of common conditions, so that operators can more easily operate cross-border, first of all for B2B service provision. Further coordination and common implementation of other applicable requirements for providers (e.g. security and law enforcement). Further harmonisation potential lies, inter alia, in end-user protection.

German industry generally supports the goal of a more coordinated approach to authorisation. We agree that it has not yet been possible to create a single European market for telecommunications, in particular due to the sometimes widely divergent regulatory systems in MS. However, while the proposed solution of a simplified and more harmonized European regulatory framework is a step in the right direction, it is not clear yet, how the deep fragmentation will be overcome and how divergences between the rules applicable to telecom operators and other players of the digital ecosystem will be eliminated. For example, telecom operators are subject to very strict, detailed national conditions concerning lawful interception, sovereignty etc., which do not apply to other players of the digital ecosystem. Without addressing these profound divergences, a simplification of the authorisation regime will

only further increase the existing imbalance within the digital ecosystem instead of promoting the competitiveness of EU telecom industry.

Therefore, we advocate for further measures to tackle the excessive bureaucracy for vendors and network operators, including a shift from the telecommunications sector consumer law towards a horizontal consumer law. In general, we believe that a significant reduction of the current regulatory framework addressing operators of digital infrastructures would have far more positive implications for the entire market than the harmonisation of authorisation can have.

Spectrum

i. Strengthen the peer review procedure, ensure timely authorisation of spectrum on the basis of an evolving roadmap and set common procedures and conditions for the national authorisation of spectrum

We generally support a more coordinated approach to the awarding procedure of spectrum in Europe. However, there is a delicate balance to be struck between a more centralised approach, which could limit local ability to respond quickly to changing market conditions or technological innovation, and the need to achieve large economies of scale, which are important for the introduction of new technologies. German industry believes that spectrum management and authorization procedures, including concrete timelines, have to remain the responsibility of Member States, while a certain level of coordination at EU level – e. g. on license duration being long enough, pro-investment allocation conditions, early and coordinated availability of spectrum resources to create scale – must be ensured and further strengthened.

Moreover, additional spectrum bands with different propagation characteristics should be made available for mobile services in a timely manner to allow the operators to cope with the ever-increasing demand.

ii. Introduce longer license duration and easier renewals. Additionally, gear spectrum auction designs towards spectrum efficiency and network deployment as basis for the early introduction of 6G

German industry strongly supports longer spectrum license durations, easier renewals as well as auctions geared towards investment as opposed to revenue maximization. Spectrum availability, awarding procedures (including costs) and the right conditions attached to licenses all fundamentally impact incentives to and cost of investing in networks. The Commission rightly identifies that the high costs of acquiring spectrum licenses through auctions have been a heavy burden for the European telecommunications sector in the past. While other markets around the world allow network operators to purchase spectrum licenses for longer time periods or even for permanent use, rights in Europe expire after 10 to 15 years and then have to be bought again. These recurring costs of spectrum licenses have deprived companies of the necessary investment funds needed to finance expansion of gigabit networks as well as to tackle current technological challenges.

Therefore, the duration of spectrum usage rights is an important lever for the competitiveness of European telecommunication network operators. German industry supports indefinite spectrum licenses or at least a longer duration of frequency usage rights. Additionally, the right of spectrum prolongations by default should be introduced into the DNA and such prolongations should become the standard mechanism. This leads to greater investment security for companies and in turn boosts the quality,

affordability and sustainability of networks. Enhanced coverage and bandwidth are integral for Europe's industry to harness the benefits of digital technologies. To also achieve more efficient spectrum usage in the future, we find that a principle of 'use it or lose it' is a sensible way forward, if it is applied equally to spectrum holders. However, telecommunication network operators should always be consulted before losing spectrum rights since there might be good reasons for a slow network expansion. Additionally, spectrum policy should address the interests of all potential users and use cases.

Auctions are an efficient approach for the initial assignment of spectrum licenses. Thereafter, prolongations are the preferred way to support network expansions and updates. Spectrum allocations should be designed to foster investments instead of extracting additional revenue for state budgets. Additionally, discriminatory auction designs that benefit market players due to their size or structure have to be avoided. A future DNA, therefore, must support the goal of lowering the costs of spectrum licenses – as outlined – and underpin it with measures to reach it.

iii. Enable flexible authorisation including spectrum sharing (in line with competition law principles) and facilitate requests for spectrum harmonisation

German industry supports EU spectrum policy which enables flexible authorisation and spectrum sharing where such sharing demonstrably improves efficiency and if it does not undermine commercial viability or service quality.

Spectrum harmonisation should be pursued to ensure timely and efficient use of spectrum across Member States, but with flexibility to accommodate national circumstances: There should be a clear EU roadmap for spectrum availability, ensuring the timely and harmonised release of additional spectrum bands across low, mid, and high frequencies. Harmonisation efforts should focus on the timing of availability and technical/economic usage conditions, rather than imposing uniform national assignment procedures. Member States should retain flexibility to assign spectrum based on market demand but should be required to efficiently allocate spectrum in key harmonised bands for nationwide mobile networks.

All measures must be consistent with competition law, avoiding artificial market-shaping, set-asides, or discriminatory obligations. Moreover, the policy should strengthen the "use it or lose it" principle, applying equally to all technologies. The Commission should implement a notification procedure for Member States to foster compliance with key principles, such as setting modest reserve prices and annual fees, and ensuring that market-shaping measures are justified with a thorough market analysis.

Overall, the policy focus should be on fostering investment, efficient spectrum use, and a sustainable, competitive digital infrastructure ecosystem.

iv. Reinforce EU sovereignty and solidarity regarding harmonisation of spectrum, and when addressing cross-border interferences from third countries

German industry supports a coordinated approach to address cross-border interferences from third countries. Cross-border interferences and restrictions should be addressed by the Commission and all Member States acting jointly in bilateral and multilateral negotiations, backed by good conditions in international agreements (e.g. primary allocations for EU mobile bands in Radio Regulations). This includes ensuring that spectrum policy is aligned with the strategic interests of the EU, safeguarding its leadership in sovereign 5G and 6G development and standardization.

v. Establish a level playing field for satellite constellations used for accessing the EU market

German industry supports the establishment of a level playing field in the EU for satellite networks, whereas support for sovereign European projects and regulatory frameworks that prioritize technological sovereignty should also receive attention. Moreover, to ensure control over critical communication systems, the scope of the considerations should include secure ground infrastructure (e.g., 5G core networks, data centers). German industry sees satellites only as a complementary technology in addition to mobile networks, not as a substitute.

To create equitable conditions for European satellite providers which may directly counter non-EU dominance while advancing digital sovereignty, European initiatives should center on regulatory alignment and public/private funding with the EU as an anchor customer.

Access Regulation

i. Apply ex-ante regulation (i.e. access conditions at national level) after the assessment of the application of symmetric measures (e.g. Gigabit Infrastructure Act or other forms of already existing symmetric access) only as a safeguard, following a market review based on the existing three criteria test and a geographic market definition, and subject to the review of the Commission, BEREC and other NRAs, with the Commission retaining veto powers

German industry supports a balanced regulatory approach that ensures and promotes competition and provides incentives for investment in broadband infrastructure. Regulatory stability, clarity and a transparent, reliable process to determine when and how interventions are needed are key to fostering innovation and securing competition in Europe's digital infrastructure.

ii. Simplify and increase predictability in the access conditions by introducing a pan-EU harmonised access product(s) with pre-defined technical characteristics, which would be a default remedy imposed on operators with significant market power if competition problems were identified

German industry is sceptical about the introduction of a pan-EU harmonised access product. First, not only in Germany but presumably in all other markets there are commercially offered access products, reflecting the needs of access seekers and tailored to the technical parameters of networks that are offering those products. Second, to make such a harmonized product practically usable, it would have to contain a detailed list of procedures, service level agreements (SLAs) and key performance indicators (KPIs) for all EU broadband access networks, as it is customary for reference access offers. Given that in Germany alone the number of broadband networks is exceeding 200, we doubt such detailed description is feasible. As a result, the description of the product would likely contain too few details to make it practical, and the pan-European access product risks ending up alongside other dysfunctional measures in today's EECC, such as voluntary separation or co-investment models. Furthermore, there is a risk that such an instrument would undermine the principle of infrastructure-based competition by facilitating market entry without any investment.

While the current lack of detail prevents a conclusive assessment, the structural complexity of broadband markets and the availability of well-functioning commercial access products raise concerns

regarding the practicality and added value of a harmonised EU-wide access product. Clarification of the intended scope and design is therefore needed.

iii. Accelerate copper switch-off by providing a toolbox for fibre coverage and national copper switch-off plans, and by setting an EU-wide copper switch-off date as default, along with a derogation mechanism to protect end-users with no adequate alternatives

German industry finds that setting a binding copper switch-off date at this stage would not be appropriate, as outlined in our contribution to the consultation regarding the White Paper. It is overly ambitious and would lead to increased costs, reduce the deployment speed of digital infrastructure in some MS as well as to the shutdown of functional infrastructure at the expense of customers. Introducing an EU-wide default switch-off date, with highly unclear “derogation mechanisms” mentioned without further explanations, raises concerns. While the current proposal does not specify a fixed year for the copper switch-off, it likely builds on earlier ambitions expressed in Scenario 5a of the White Paper, which included a target of switching off 80% of copper networks by 2028 and a full switch-off by 2030. Such targets remain overly ambitious for several Member States, including Germany. Increasing the fiber coverage to 100 per cent and migrating all customers to this new infrastructure within less than five years, if 2030 would still be the intended goal, would be very difficult to realise, in particular due to the shortage of skilled labor.

German industry therefore advises the European Commission to refrain from a fixed switch-off date for copper networks. The DNA should rather adopt a technology-neutral approach, incorporating also alternative technologies capable of delivering gigabit speeds, while at the same time supporting fiber rollout and making the switchover process competitive and user friendly. It should also strengthen infrastructure competition as a basic pillar for investment, innovation and resilience.

While full fiber networks are the future, the DNA should embrace technological neutrality by recognizing that multiple technology solutions can efficiently serve different market segments and geographic areas. Alternative networks providing a high connectivity quality can fulfill the needs of a wide range of customers and should be evaluated based on performance outcomes rather than technology preferences. This technological neutrality principle is particularly important for addressing coverage gaps in economically challenging areas, where fiber deployment may be prohibitively expensive. The regulatory framework should focus on achieving connectivity objectives through the most efficient combination of technology, rather than mandating specific technical solutions.

In recent years, some telecommunication operators have also opted for upgrading cable networks to a Hybrid Fiber-Coaxial (HFC) architecture – and are still investing – or have significantly invested in other technologies all being capable of providing a very high-capacity network as defined and set as a goal. Another example is the expansion of 5G mobile networks. These investments by telecommunication network operators have been very costly and the political as well as legal framework conditions should safeguard such private investments and should provide for the necessary investment security.

Necessary components of the DNA not addressed by the European Commission

Funding & IPCEI: A simplified and coordinated support framework

The transformation of the EU’s connectivity industry and infrastructure requires significant investment capacities. There are a number of EU funding instruments and programs that support private

investments in R&I in relation to the communications sector. These include the Smart Networks and Services Joint Undertaking (SNS JU) under Horizon Europe, but also InvestEU, the Digital Europe Programme (DEP), Important Projects of Common European Interest (IPCEIs) and the Connecting Europe Facility (CEF) Digital. However, to achieve the European Commission's objectives regarding the future European connectivity and digital infrastructure, the DNA must substantiate the goals of improving the support framework drawn up in the White Paper and underpin them with measures to reach those goals.

An industrial policy approach cannot just stand in isolation. To be effective, it should be integrated and streamlined horizontally across various policy areas impacting the digital infrastructure sector. A more simplified and coordinated infrastructure-related support framework would lead to a more efficient usage of resources – in terms of finances as well as personnel in both public institutions and private industry – resulting in enhanced connectivity for society and industry. Current programs, such as the IPCEIs, are often inefficient and overly bureaucratic. Therefore, a more coherent approach, which provides a single point of entry for funding and brings together relevant actors of the ecosystem, is very desirable. Additionally, we support the idea of identifying strategic technologies and the build-up of technological capacities in those areas in Europe. An open, clear and coordinated industry strategy would enable synergy effects and leverage more private investment. For example, a new infrastructure focused IPCEI incorporated into a more active industrial policy, would be welcomed, as this would provide the funds necessary for the large-scale deployment of advanced digital infrastructure and support the goal of bringing Europe technologically back on par with the US and China. Nevertheless, any new communication technology development should, as far as possible, aim for global standards in the interest of European industries operating in global markets.

To make a real difference in the roll-out of advanced digital infrastructure and support European companies in a meaningful way, a prospective IPCEI for infrastructure must be less bureaucratic, more streamlined and efficient. In particular, the time from announcement of the programme to the notification of the funding decisions must be significantly shortened if the project shall attract applications from interested companies. To achieve this goal, approval procedures must be simplified, digitized and accelerated. The European Commission should provide sufficient capacity for this. The IPCEI processes in individual Member States are currently not coordinated in terms of timing and are sometimes carried out in several, unaligned phases. There is an urgent need for better coordination and appropriate harmonization, even in the prenotification and notification phase. In addition, the funding must be substantial. In the past, IPCEIs had comparatively low funding volumes in the single-digit billion range per technology field compared to huge investment programmes adopted by global competitors, such as North America and China. Therefore, a future infrastructure focused IPCEI has to receive a designated budget within the EU budget, which is high enough to enable Europe to compete on a global scale. It is also important that the funding is not pulled out of already existing programs like Horizon Europe since this would weaken the support of other key technological areas.

Ensuring the resilience of digital infrastructure

Recent developments across Europe have dramatically underscored the critical importance of securing the continent's digital backbone infrastructure. The landscape of European network security has been fundamentally altered by a series of high-profile incidents, demonstrating that infrastructure security threats are not hypothetical but active and escalating risks to European digital sovereignty. These incidents, ranging from alleged submarine cable sabotage in the Baltic Sea to sophisticated cyber campaigns targeting critical government systems, have exposed fundamental vulnerabilities in Europe's critical connectivity infrastructure. The threat environment has intensified significantly, with European

authorities documenting unprecedented levels of state-sponsored cyber activity targeting critical infrastructure across multiple sectors.

In consequence, Europe needs to develop a harmonised legal security framework for its connectivity infrastructure.

It is important to avoid additional regulatory burdens that could discourage investment in infrastructure and the implementation of provisions across different legislations. This could be remedied by introducing all relevant legislative matters in a single act. This would go hand in hand with reinforced maintenance and repair capability in the EU, which is crucial to mitigating future risks.

Acceleration of permit and authorization procedures

To achieve the goal of providing companies and the population with high-performance Internet access EU-wide – and thereby to reach the EU's targets for digital infrastructures – hundreds of thousands of kilometers of fiber optic cable will have to be laid in the next few years and tens of thousands of mobile phone towers will have to be built or modernized. This will only succeed within the targeted timeframe if existing expansion hurdles are reduced and the full potential for acceleration is exploited. Currently, the authorization procedures for new cell phone towers take on average 18 to 20 months in Germany. Such lengthy permit procedures significantly hinder a speedy expansion and modernization of digital infrastructures.

Fast authorization procedures are of utmost importance. To achieve the ambitious infrastructure targets that have been set, permit procedures must be streamlined, consistently digitalized and drastically shortened. The Gigabit Infrastructure Act has failed in introducing a binding tacit approval mechanism and allows Member States to derogate from it. Therefore, the DNA should introduce tacit approval within two months after submission of a respective building request.

Imprint

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