The City of Stockholm's comments on the White Paper –"How to master Europe's digital infrastructure needs?"

The City of Stockholm welcomes the European Commission's White Paper "How to master Europe's digital infrastructure needs?". The purpose of the White Paper is to identify challenges and discuss possible scenarios for public policy actions, such as a possible future Digital Networks Act, that aim to incentivise building the digital networks of the future, master the transition to new technologies and business models, meet future connectivity needs of all end-users, underpin competitiveness of our economy and ensure secure and resilient infrastructures and the Union's economic security as reflected by the common commitments of the EU Member States in the Digital Decade Policy Programme.

For the city of Stockholm, it is of great importance to be involved in influencing and shaping the direction of the EU's digital infrastructure, as it affects many of the city's daily operations. Therefore, the City of Stockholm welcomes initiatives from the EU level that aim to increase and improve the expansion of digital infrastructure within the EU and enable the digitization of society and services in general. The city is positive about engagement in promoting digital development, but at the same time emphasizes the importance of ensuring both ethical and legal aspects in all processes. In addition, cities need more financial and operational support to manage the intensification of public sector digitization, both based on new legislative requirements and for new technology use.

Promotion of innovative technology through collaboration

- The EU's legislation on digitization emphasizes the role of cities in the digital transition, with among other things, greater responsibility for reporting, implementation and crisis management. Thus, more funding should be directed towards cities as main actors, for example through an extension of the program Digital Europe.

- Within the program Digital Europe, the city believes that municipalities should be activated as participants. Active

participation leads to more effective application and a stronger connection to municipalities' real social challenges.

- The announcements within the program, which are to contribute to societal challenges, should be formulated with clearer writing so that projects are based on the real needs of municipalities. This can increase public actors' incentive to plan participation in externally financed projects as part of their business development.

- An example of cities' active role is to open up their operations and make available test environments for companies, academia, non-profits or other actors to test and develop solutions and innovations. In the case of research projects where municipalities' natural role is to be demonstration and test environments, it would be desirable that both approach and implementation are connected to local challenges.

- The city looks positively on investments to strengthen technology development, competitiveness and resilience. When it comes to promoting innovation through for example test beds, the collaboration is positive. However, the proposals presented in the White Paper are difficult to assess as they are of such a general nature.

- In scenario two, the Commission describes the possibility of setting up a so-called important project of common European interest (IPCEI) which may be of interest to recipient cities. Suggestively, projects of this nature could focus on meeting the need for digital infrastructure deployment to handle future computational demands for AI.

- IPCEI projects can be advantageously used as planning support for the transition expected in the transport sector for simulating the distribution of transport modes and travel patterns as a basis for dimensioning and prioritization support, but also for challenges with promoting innovative AI technology while maintaining high cyber security.

Completing the Digital Single Market

- Digitization of public services is fundamental for the EU to achieve the digital goals by 2030. The city is positive about initiatives that promote data sharing, open data and interoperability, which are central to completing the digital single market. At the same time, this type of development requires clear guidelines and adequate support to ensure effective implementation as well as adapted resources for implementing actors. The role of public actors in the implementation of digitization legislation should also be clarified.

- The City of Stockholm highlights the need for adequate resources, in the form of both financial, technical and competence, to implement already proposed initiatives and regulations. Good coordination between the different levels of administration is also required to maximize efficiency and benefit for citizens.

- The experience from Stockholm is that competition drives investments in infrastructure and innovation and contributes to low end customer prices. The White Paper emphasizes that previous competition in the area has contributed to a fragmented market where there is a lack of incentive for investment due to low profitability. This approach is problematic and the Swedish market shows the opposite, for example there are over 100 operators and service providers and 800 other customers in Stokab's (The city of Stockholm's) network.

- New legislation in the area risks becoming problematic if the starting point is to support the member states that have a low expansion rate rather than building on and widely introducing the business models that work well, for example the Stokab model. The city emphasizes the importance that this type of initiative does not hinder development in the Member States that are forerunners.

- Municipalities face varying challenges and have different resources at their disposal. In recent years there has been a lot of new legislation linked to digital infrastructure and the focus should now be on the implementation and harmonization of this legislation before new legislation is initiated. In order to promote investments in digital infrastructure, legal predictability is crucial.

- The level of complexity in many of the EU regulations and directives, adopted in the field, affects the local level. The city therefore requests clarity and clarifications in future legislation and/or regulations relating to technology and data use. Successful implementation of new initiatives requires stable and predictable governance structures, legal clarity and avoidance of overlap between different legislations, especially in relation to data use and AI.

Secure and resilient digital infrastructures for Europe

- Underwater security needs to be seen together in context with onshore fibre so that underwater risks cannot leak to or affect onshore fibre, which can then become vulnerable to cyber-attacks or other disruptions.

- The city believes that redundancy of underwater infrastructure is crucial, this to minimize the impact in the event of interruptions, which can be ascertained based on previous incidents with gas lines that were affected by interruptions.

- Underwater cables can also contribute in a regional perspective where the archipelago and the Baltic Sea in direct connection to the city are an important and strategic location.