

## Part III.8 – Supplementary Information Sheet for the notification of an evaluation plan

*Member States must use this form for the notification of the evaluation plan in accordance with Article 1 paragraph. 2(a) of Regulation (EU) No 651/2014 and, in<sup>1</sup>the case of a notified aid scheme under assessment, as set out in the relevant Commission guidelines.*

*Please refer to the Commission Staff Working Document “Common methodology for State aid evaluation”<sup>2</sup> for guidance on the drafting of an evaluation plan.*

### 1. Identification of the aid scheme to be evaluated

- (1) Title of aid scheme: Regulation of the Minister for Digitalisation of 7 December 2022 on the granting of aid for the development of broadband infrastructure under the National Recovery and Resilience Plan (Journal Of Laws, Items 2604)
- (2) Does the evaluation plan concern:
  - a)  **a programme subject to evaluation in accordance with Article 1. 2(a) of Regulation (EU) No 651/2014?**
  - b)  ~~the scheme notified to the Commission in accordance with Article 108(1). 3 TFEU?~~
- (3) Reference of the scheme (to be completed by the Commission):
- (4) Please list any existing ex-ante evaluations or impact assessments for the aid scheme and ex-post evaluations or studies conducted in the past on predecessors of the aid scheme or on similar schemes. For each of those studies, please provide the following information: (a) a brief description of the objectives of the study, the methods used, the results and conclusions and (b) the specific challenges that may have arisen in evaluations and studies from a methodological point of view, e.g. the availability of data that are relevant for the evaluation of this evaluation plan. If appropriate, please identify relevant areas or topics not covered by previous evaluation plans that should be subject of the current evaluation. Please provide the summaries of such evaluations and studies in annex and, when available, the Internet links to the documents concerned.

Study “Analysis of the effects of public interventions undertaken so far on the basis of the aid programme for priority axis I of the Digital Poland Operational

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1 Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (OJ L 187, 26.6.2014, p. 1).

2 SWD(2014)179 final of 28.5.2014.

Programme 2014-2020 and the evolution of the telecommunications market in Poland during the implementation of the programme”

The study report is available at:  
[https://www.polskacyfrowa.gov.pl/media/91289/POPC\\_analiza\\_intervencjapubliczna\\_24062020.pdf](https://www.polskacyfrowa.gov.pl/media/91289/POPC_analiza_intervencjapubliczna_24062020.pdf)

(a) brief description of the objectives of the study, methods used, results and conclusions

On the basis of Decision C(2016) 2144 of 15 April 2016, taken in case ref. SA.43484, the European Commission required Poland to carry out studies analysing the effects of the aid scheme for priority axis I of the Operational Programme Digital Poland (hereinafter referred to as “the first axis of the OP MS”), namely the Regulation of the Minister for Administration and Digitalisation of 16 September 2015 on the granting of aid for the development of broadband infrastructure under the Operational Programme Digital Poland for 2014-2020 (Journal Of Laws, Items 1466, 2016, item 1648, 2017, item 2025 and 2019, item 2034).

The objectives of the analysis were as follows:

1. Identify the effects of the interventions taken so far on the basis of the aid scheme and the impact of the intervention on:
  - 1)... achievement of the OP MS’s main objective I – Universal access to high-speed internet – and the specific objective – Tackling territorial disparities in high-speed internet access,
  - 2)...the state of the telecommunications market in Poland from the publication of the first competition for funding projects for broadband networks under axis I of the OP MS until the date on which the final analysis report is drawn up on the basis of the research questions.
2. Identifying areas in the aid scheme itself or in the context of interventions based thereon that could be subject to modifications to improve the provision of support under the aid scheme or further maximise the impact of that support.

Subject of the testing:

The main subject of the study was the aid scheme, i.e. the Regulation of the Minister for Administration and Digitalisation of 16 September 2015 on the granting of aid for the development of broadband infrastructure under the Digital Poland Operational Programme 2014-2020. In addition to the aid scheme, the following were also analysed:

1. the content of calls for funding applications organised so far on the basis of the programme (and annexes);
2. anonymised information on the support provided under the programme;
3. the market for internet access in Poland in 2015-2019 for the partial report and 2015-2020 for the final report.

Test entity:

The analysis included:

1. Telecommunications undertakings and local government bodies carrying out telecommunications activities;
2. Entities applying for support under past interventions undertaken on the basis of an aid scheme;
3. Beneficiaries of support provided on the basis of the aid scheme;
4. Experts evaluating grant applications;
5. The Managing Authority (Minister for Regional Development, hereinafter referred to as “IŻ”), the Intermediate Body (Centre for Digital Poland Projects, hereinafter “IP” or “CPPC”), the Environment Authority for Partnership Agreement (Minister for ITisation) and the specialised institution for the first axis of the OP PC (President of the Office of Electronic Communications, hereinafter “UKE”);
6. Subcontracting of broadband projects, including subcontracting of supported projects (at least in the construction sector).

Test methodology:

The study was carried out using the concept of TBE – theory-based evaluation. An evaluation based on theory requires a detailed analysis of the assumptions on which the programme is based.

The TBE approach therefore follows each step of the programme’s intervention logic, identifying causal links and mechanisms of change leading to results and impacts.

The following methods were used in the research process: desk research; quantitative CAWI/CATI studies; qualitative research in the form of in-depth interviews, benchmarking.

The analysis of legacy data consisted of an analysis of available data and documents (such as project documents, legal documents, publications, statistics). It was the basis for further stages of the study. The purpose of the examination of the documents was to establish the facts.

A number of quantitative studies were also carried out as part of the analysis. The CAWI5 and CATI6 studies were carried out among the following groups of respondents: beneficiaries, subcontractors of beneficiaries, non-beneficiaries, subcontractors of non-beneficiaries. It should be noted that CAWI/CATI was also used during the counterfactual method.

Qualitative research was carried out by means of individual in-depth interview (IDI9). The research material collected was complementary to the data collected by other test methods. As part of the qualitative study, the beneficiaries and institutions involved in the implementation of the aid scheme were interviewed.

Key results and conclusions:

In the first three competitions, 52 beneficiaries were selected for co-financing projects which carry out investments in designated areas (the first competition 72 areas; Second competition 50 areas; 3rd competition 35 areas). Network coverage of these areas would not have been possible without funding, due to the

low cost-effectiveness of such projects. The total support provided to projects was close to 57 % of their total value, with different projects implemented by beneficiaries. On the basis of the analysis carried out, the effectiveness of the support provided under the aid scheme is high. This is confirmed by the values of the indicators declared by the beneficiaries in the signed grant agreements. This was mainly influenced by the competitive nature of the calls and the preference given to beneficiaries to support as many households as possible.

Statistics on labour market developments in the telecommunications sector and the results obtained from surveys on changes in employment levels among beneficiaries of the programme and their subcontractors suggest that the supported investments have had a significant impact on the sectoral labour market. The programme has so far increased the number of jobs among the entrepreneurs surveyed (implementing activities under the programme) by more than 2000 jobs, representing the majority of new jobs in this sector of the economy.

Recommendations:

1. It is recommended to amend the Regulation of the Minister for Administration and Digitalisation of 16 September 2015 on the granting of aid for the development of broadband infrastructure under the Digital Poland Operational Programme 2014-2020, in Section 3, by deleting point 2 of ‘local self-government units or their associations, local government units (hereinafter referred to as “JST”) operating under an agreement with other entities in an area in which none of the entities referred to in point 1 has submitted a request for support’, and by deleting in Section 4, point. 8, point 1, of the wording ‘or the register of local government units engaged in telecommunications activities’. The implementation of broadband investments by JSTs in the previous programming period showed that:

- these projects were very costly (which involved the exclusion of public funds);
- the investments were a problem for USTs, as the USTs were not prepared for this type of task and had no experience in constructing telecommunications infrastructure.

At the same time, an evaluation study has shown that the experience, potential and involvement of private telecommunications operators in the implementation of projects has a positive economic effect. It is therefore legitimate for projects to be carried out exclusively by telecommunications companies;

2. It is recommended that experts, when establishing the List of Intervention Areas, for the purposes of the call documentation in the next financial perspective, seek to identify as small as possible areas where projects can be carried out (if justified and appropriate). Reducing the areas where projects can be carried out will increase the number of potential beneficiaries and thus have a positive impact on employment, especially in local markets.

3. Information and promotion meetings for potential beneficiaries in the next programming period should address the potential problems and risks they may face in the implementation of projects. Applicants should be offered preliminary interviews with private landowners, railway services and the General Directorate

for National Roads and Motorways (hereinafter “GDDKiA”) before the application for funding is submitted, in order to make the potential beneficiaries aware of the scale of the problems they may face.

4. Universal access to high-speed internet has a positive impact on the development of the information society. It is recommended that a nationwide image campaign be carried out to highlight the positive effects of the implementation of projects under Measure 1.1 of the OP MS. An optional action may be to provide information and promotional material in the form of leaflets, brochures or folders showing the importance of projects undertaken in Action 1.1 directly to representatives of the railway services or GDDKiA. A meeting between representatives of the MA and IB of the MS OP with representatives of GDDKiA and railway services may also have a positive impact, in order to present the role of these institutions in the smooth implementation of projects by beneficiaries under the OP MS.

5. It is recommended that in the future financial perspective, the level of comprehensibility and transparency available to beneficiaries should be maintained.

6. It is recommended that organisational, temporal and financial resources be reserved in the forthcoming financial perspectives for adjusting the initial design of individual interventions in order to optimise them. If the implementation of an intervention in a given area was unsatisfactory, conditions should be created to correct these assumptions and the possibility of making possible changes, before implementing further interventions in the same area. Experience to date has shown that it is of the utmost importance that, in the event of problems with the implementation of projects in a given area, there should be a modernisation of the existing targets.

7. In view of the fact that the reports and data published by UKE are a valuable source of information for beneficiaries planning projects, as well as for local and regional authorities and undertakings seeking information on broadband infrastructure, it is recommended that UKE’s search engine be updated, available on the following website: <https://wyszukiwarka.uke.gov.pl/>, and an update of the Broadband Atlas, available at: <https://mapbook.uke.gov.pl/>

8. In the next programming period 2021-2027, it is recommended to consider as ‘white areas’ areas where services of at least 100 Mbps are not provided.

(b) the specific challenges that may have arisen in evaluations and studies from a methodological point of view, e.g. the availability of data that are relevant for the evaluation of this evaluation plan.

The final report ‘Analysis of the effects of public interventions undertaken so far on the basis of the aid programme for priority axis I of the Digital Poland Operational Programme 2014-2020 and the evolution of the telecommunications market in Poland during the implementation of the programme’, together with an executive summary, is set out in the Annex. No problems were identified with access to data enabling the study to be carried out:

(1) a number of data necessary from the point of view of the methodology were available in a central system for monitoring the progress of projects supported under the aid scheme examined;

(2) the beneficiaries of the programme were required to participate in evaluation studies carried out at the request of the institutions participating in the implementation system for the first axis of the OP MS.

## 2. Objectives of the aid scheme to be evaluated<sup>3</sup>

**2.1.** Please provide a description of the aid scheme specifying the needs and problems the scheme intends to address and the intended categories of beneficiaries, for example size, sectors, location, indicative number.

The Regulation of the Minister for Digitalisation of 7 December 2022 on the granting of aid for the development of broadband infrastructure under the National Recovery and Resilience Plan (hereinafter referred to as the 'NRP') sets out the national legal bases for granting State aid for projects consisting of the construction of broadband networks from European Union funds under the RRP.

At the end of 2021, almost 20 % of households in Poland still did not have internet access of at least 30 Mbps and 27.5 % of households did not have access to internet speeds of at least 100 Mbps. These households are mainly located in rural and remote areas with low population density, where commercial investments in high-speed internet access networks are not made due to their unprofitability.

In the Financial Perspective 2014-2020, the Operational Programme Digital Poland, hereinafter referred to as "MS OP", supports broadband investments in the above-mentioned areas, but because of the limited funding, they do not cover all the so-called white spots in Poland. According to UKE's estimates, after completion of the investments co-financed by the OP MS, there are still around 16 % of households in Poland will not have access to internet speeds of at least 30 Mbps.

In the financial perspective 2021-2027, public interventions in the area of funding for broadband deployment in digitally excluded areas will continue. The RRP will allocate at least EUR 1.2 MLD to this end. These measures are expected to provide internet access of at least 100 Mbps to 931 thousand end users (households, businesses, public buildings, etc.) located in the long-term unprofitable areas of Poland.

Universal access to high-speed internet is one of the objectives of the National Broadband Plan, which assumes that by 2025 all households in Poland will be networked, enabling internet access services of at least 100 Mbps and ready-to-provide Gigabit services.

High-speed internet today is a basic home medium, equal access to electricity and running water, and some countries even recognise it as a fundamental human right.

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<sup>3</sup> Beyond providing a general description of the objectives and eligibility rules of the scheme, the aim of this section is to assess how the eligibility and exclusion rules of the scheme may be used to identify the effect of aid. In some cases, the precise eligibility rules may not be known in advance. In those cases the best available expectations should be provided.

Access to fast, reliable internet significantly improves the capacity of households, businesses and other socio-economic actors. Therefore, efforts to ensure that all citizens have equal access to the Internet at a high, minimum level, should be given the highest priority in the current times, especially after difficult pandemic experiences.

The beneficiaries of the programme implementing telecommunications projects will be telecommunications undertakings – both small and medium-sized enterprises and large enterprises.

UKE's Register of Telecommunications Undertakings contains 4017 entities that are theoretically able to implement projects. Under the OP MS, more than 50 entities were supported.

- 2.2.** Please indicate the objectives of the scheme and the expected impact, both at the level of the intended beneficiaries and as far as the objective of common interest is concerned.

The aim of the measures will be to ensure universal access to high-quality telecommunications infrastructure and modern electronic communications services throughout the country. In particular, ensuring very high-speed internet in excluded areas and eliminating 'white spots' will be crucial. Investments will be made to expand the very high capacity and capacity broadband network, improve its performance and availability to distribution points in multi-family buildings, homes and public service places and business.

The infrastructure set up will be based on solutions that will enable end-users to provide internet access services of at least 100 Mbps, while being ready to provide services with speeds measured in Gbps, which will also achieve the objective of the National Broadband Plan by 2025, and will be in line with the objectives of the so-called 'Gbbroadband'. Digital Compass. The measures taken will accelerate the development of information and communication technologies (ICT), providing every resident in Poland and economic operators with a guarantee of access to high-speed internet and digital services.

- 2.3.** Please indicate the possible negative effects on the beneficiaries of the aid or on the wider economy that may be directly or indirectly linked to the aid scheme<sup>4</sup>.

#### Crowding out private investment

In the case of broadband investments, in accordance with Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (hereinafter 'GBER'), public aid may only be granted where no commercial investment is carried out and planned. In practice, this means that subsidised broadband networks are set up in unprofitable areas, i.e. remote areas, villages, diffuse areas. Both the provisions of the GBER and the aid scheme and past practice in the implementation of projects

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<sup>4</sup> Examples of negative effects are regional and sectorial biases or crowding out of private investments induced by the aid scheme.

under the OP MS ensure that State aid does not distort competition in the telecommunications market. Aid is granted only where networks are not created without this aid.

#### Over-aid

The risk that always arises in the context of the provision of State aid is whether it has been limited to the minimum necessary. The aid scheme states that the amount of aid will be limited to the minimum necessary to enable the project to be carried out in the area concerned by means of a verification of needs. The verification of needs will consist of carrying out an economic analysis of the cost-effectiveness of the construction of NGA networks in the area concerned, taking into account eligible costs and projected revenues. In addition, telecommunications companies will compete on the price – the smaller the amount of co-financing requested, the more points will receive the application during the evaluation.

#### Cherry picking

Cherry picking, i.e. selecting the best and easiest areas for projects, is another phenomenon that could have a negative impact on the achievement of the objectives of the aid scheme. Experience with the implementation of broadband projects under the OP MS will help to reduce its prevalence. First, it has been limited at the level of the establishment of intervention areas. The areas of intervention will be created in such a way that the geographical conditions for the implementation of the project are as close as possible to the extent possible. As a general rule, the areas of intervention will cover the area of the district. An intervention area may cover several districts or be part of a district, depending on its specificity (construction density, projected capital expenditure). In addition, the so-called coverage obligation for areas (i.e. the scope of households that the beneficiary is obliged to cover the co-financed network) will be increased – the beneficiary will have to cover all white address points (except in exceptional cases), as opposed to projects implemented under OP MS, where beneficiaries were entitled to select households themselves from the list of white spots made available.

- 2.4.** Please indicate (a) the planned annual budget of the scheme, (b) the planned duration of the scheme<sup>5</sup>, (c) the aid instrument(s) and (d) the eligible costs.

The programme has a total budget of EUR 1.2 billion. Assistance is expected to be provided in 2023 and the projects will be implemented and cleared until mid-2026 (in line with the relevant rules for the implementation of the Recovery and Resilience Fund). Hence, the average annual budget of the programme can be set at EUR 0.3 billion over the period 2023-2026.

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<sup>5</sup> Aid schemes as defined in Article 1 (1). Point (a) of Regulation (EU) No 651/2014 is excluded from the scope of the Regulation six months after its entry into force. After having assessed the evaluation plan, the Commission may decide to extend the application of the Regulation to such schemes for a longer period. Member States are invited to precisely indicate the intended duration of the scheme.

Support will be provided in the form of non-repayable co-financing, with support being limited to the minimum necessary to enable projects to be carried out in the area concerned (which will ensure both: a needs verification mechanism, a project selection criterion rewarding the reduced need for public contribution to the project, and the use of a nationwide ranking list, where applications will receive support from the most to the least economically efficient).

In accordance with Article 52. 2 The GBER may be eligible for any costs for the construction, management and operation of a fixed broadband network. Operating costs and necessary investment costs will be eligible, such as:

— investment costs for the construction of passive broadband infrastructure, including construction works and materials, and the supply and installation of broadband infrastructure elements,

— the costs of preparing the documentation necessary for the execution of the works,

costs for the supply, installation and commissioning of telecommunications equipment constituting the active infrastructure of the NGA network,

— the cost of renting, leasing or leasing of passive broadband infrastructure, as well as elements of electricity, sanitation, water supply infrastructure and technological channels,

— investment costs for the construction of NGA networks, including those related to the upgrading or expansion of a broadband network to the NGA standard,

— public-law charges relating to the preparation and implementation of a project, in particular for the adoption of decisions, approvals and permits,

costs of preparing as-built documentation within the meaning of the Construction Act of 7 July 1994 (Journal Of Laws 2021, item 2351 and 2022, item 88, 1557, 1768, 1783,1846 and 2206),

**2.5.** Please provide a summary of the eligibility criteria and the methods for selecting the aid beneficiaries. In particular, please describe the following: (a) the methods used for selecting the beneficiaries (e.g. scoring), (b) the indicative budget available for each group of beneficiaries, (c) the likelihood of the budget being exhausted by certain groups of beneficiaries, (d) scoring rules when applying a scoring to the scheme, (e) aid intensity thresholds, (f) criteria that the granting authority will take into account when assessing applications.

a) the methods used for selecting the beneficiaries (e.g. scoring), and (f) the criteria to be taken into account by the granting authority when assessing applications

The beneficiaries will be selected on the basis of a competitive procedure in accordance with Article 52. 6(a) of Commission Regulation (EU) No 651/2014. The aid scheme sets out the basic conditions that a telecommunications undertaking must fulfil in order to be eligible for funding. The criteria for selecting projects are set out in the rules of the competition. Applications will be evaluated on the basis of the following criteria:

Formal – zero-single ocean (completes/does not meet)

— Substantive (scoring), with two criteria referring to:

1) minimising the public contribution – the smaller the amount of funding requested, the more points in the evaluation process;

(2) pledges of additional commercial (own) investments – the higher the declared value of investments in internet access networks financed without public funding, carried out in parallel by the project, the more points in the evaluation process.

The selection criteria will be approved by the relevant Monitoring Committee.

(b) the indicative budget available for each group of beneficiaries,

The beneficiaries of the programme will be exclusively telecommunications undertakings. The total budget available to telecommunications companies is EUR 1.2 billion (programme budget).

(C) the likelihood of the budget being exhausted by specific groups of beneficiaries,

Due to the need to clear projects by mid-2026, all available allocation will be made available in one call for project projects. If the allocation is not exhausted, another call is likely to be organised.

d) scoring rules when scoring is applied to the programme,

1. The proposal is subject to two-stage competition. Applicants will compete with each other:

1) in the relevant area of the competition, which application will be included in the national ranking list, and

(2) on the nationwide ranking list – relative to the available allocation in the vacancy.

2. Eligibility for support will be decided by:

1) Competition in the area of the competition – one successful application is selected in a given area, which scores the highest score among all applications submitted in the same area. Substantive criteria for minimising public contributions and self-investment declarations shall be taken into account;

b) Competition with allocation – Applications with the highest scores, selected from all areas of competition, are placed on the national ranking list in order of the highest to lowest scores obtained in the substantive criterion on minimising public contribution.

3. In the case of applications which, as a result of a merit-based assessment, obtained the same number of points in a given area of competition, the national ranking list shall include the application submitted at the earliest.

4. Applications are selected for support in order from the highest to the lowest on the national ranking list, until the selection allocation is exhausted.

(e) aid intensities,

The maximum possible intensity of support will be 100 % of the eligible costs.

**2.6.** Please mention specific constraints or risks that might affect the implementation of the scheme, its expected impacts and the achievement of its objectives.

The biggest risk to the achievement of the objectives of the aid scheme is the limited duration of the projects. Projects under the RRP must be completed by mid-2026. This means that broadband projects will have to be implemented very quickly. In case of delays or resignations by beneficiaries during the lifetime of projects (contract terminations), the indicators set may not be achieved and the allocation will not be fully spent.

### 3. Evaluation questions

**3.1.** Please indicate the specific questions that the evaluation should address by providing quantitative evidence of the impact of aid. Please distinguish between (a) questions related to the direct impact of the aid on the beneficiaries, (b) questions related to the indirect impacts and (c) questions related to the proportionality and appropriateness of the aid. Please explain how the evaluation questions relate to the objectives of the scheme.

Questions on the direct impact of the aid on the beneficiaries:

- How many telecommunications companies and which category (micro, small and medium/large entrepreneur) received support under the programme?
- How many addresses were in broadband coverage thanks to investments with the support provided under the programme?
- What is the value of the projects carried out by the beneficiaries?

The questions set out above concern the direct effects of the aid. They will assess whether the target indicator set out in the National Recovery and Resilience Plan (covering 931 thousand end users) has been achieved and what the financial expenditure has been incurred (whether the allocation has been fully used).

Questions on indirect effects:

- What is the total value and volume of infrastructure implemented with the support provided under the programme?
- To what extent has broadband coverage been increased in the areas covered by the Programme's intervention?
- How many jobs were created by entrepreneurs who received support under the programme?

- What are the prices of internet access services in the target areas of the projects being implemented, and what are the differences between these prices and those provided in commercially viable areas of the country?
- How is the demand for retail services offered on broadband networks provided by the beneficiaries of the scheme (e.g. in terms of the number of retail services provided on the basis of these networks and the dynamics – speed – of sales of services since the start of offering them)?
- What is the total value and volume of wholesale services provided by the beneficiaries of the scheme based on the infrastructure provided with the support?
- What are the costs of implementing the infrastructure with the support provided under the programme?
- Has the support provided under the scheme affected the inflation of the prices of goods and services related to the telecommunications investment process compared to the prices prevailing before the start of the aid scheme?

Questions on indirect effects will capture the indirect impact of the aid. The network built is not only used by the beneficiaries but also by other wholesale operators. It is important to verify the extent to which such services are provided. In addition, the implementation of projects may have an impact on the labour market (e.g. construction services). An important research element is also the extent to which the increased supply of infrastructure provided by the beneficiaries of the programme has had an impact on meeting the demand for user services from the target areas.

Questions on the proportionality and adequacy of the aid:

- Was the programme support provided on an equal, non-discriminatory basis?
- What mechanisms are foreseen in the programme to ensure the incentive effect and proportionality of the support?
- What is the effectiveness of the support provided under the aid scheme?
- To what extent does the public support provided under the aid scheme contribute to the commitment of the beneficiaries' own resources?

The questions set out above seek to establish whether the aid was granted in an efficient manner and did not distort competition. To this end, it is necessary to determine whether any potential beneficiary could apply for support and was assessed on the same basis. In addition, in order to determine whether the aid was adequate, it is useful to examine whether the costs of private and co-financed investments are comparable.

The above list of questions may be extended before the start of the study.

#### 4. Results indicators

- 4.1.** Please use the following table to describe which indicators will be built to measure outcomes of the scheme, as well as the relevant control variables, including the sources of data, and how each result indicator corresponds to the evaluation questions. In particular, please mention (a) the

relevant evaluation question, (b) the indicator, (c) the source of data, (d) the frequency of collection of data (for example, annual, monthly, etc.), (e) the level at which the data is collected (for example, firm level, establishment level, regional level, etc.), (f) the population covered in the data source (for example, aid beneficiaries, non-beneficiaries, all firms, etc.):

<b>Evaluation question</b>	<b>Indicator</b>	<b>Source</b>	<b>Frequency</b>	<b>Level</b>	<b>Population</b>
How many telecommunication companies and which category (micro, small and medium/large entrepreneur) received support under the programme?	Number of beneficiaries	CPPC/Project Monitoring System	Current update when recruitments are settled and changes to the list (e.g. in case of termination of contract)	Institutional - CPPC	-Beneficiaries
How many addresses were in broadband coverage thanks to the investments with the support provided under the programme?	Additional households (housing units) with broadband access of at least 100 Mbps (with the possibility to increase it to the speeds measured in Gbps)	(CPPC/Monitoring and Projects)	At least quarterly	Institutional - CPPC	-Beneficiaries
What is the value and cost of the projects carried out by the beneficiaries?	Project cost	CPPC/Project Monitoring System	At least once every six months	Institutional - CPPC	-Beneficiaries

Please explain why the chosen indicators are the most relevant for measuring the expected impact of the scheme.

These indicators form the basis for determining whether the aid scheme has produced the expected effects. The objective of the aid scheme is to provide broadband internet access in white spots, so it is crucial to measure how many addresses are covered by such access. Information on the number of entrepreneurs and categories (SMEs/large) is the basis for assessing whether support was provided on equal terms. An indicator on the value of the projects will make it possible to assess the involvement of the beneficiaries' own contribution.

**5. Envisaged methods to conduct the evaluation**

**5.1.** In light of the evaluation questions, please describe the envisaged methods to be used in the evaluation to identify the causal impact of the aid on the beneficiaries and to assess other indirect impacts. In particular, please explain the reasons for choosing those

methods and for rejecting other methods (for example, reasons related to the design of the scheme).<sup>6</sup>

The detailed testing methodology will be set out by the Evaluator in the methodological report (the Contracting Authority will require such a report to be drawn up).

The primary test method will be to analyse legacy data. A number of data are collected by the aid provider, the CPPC, in the process of monitoring the progress of the programme. In addition, quantitative CAWI/CATI studies per group of beneficiaries will be used. In addition, qualitative research in the form of in-depth interviews is foreseen. Where possible, benchmarking (counterfactual method) will be used. In the case of this aid scheme, its application is limited. Broadband investments under the scheme are made where no commercial investments are made. These are unprofitable areas with low population density. Investment costs are higher and there is longer time to return on investment. Therefore, in the case of broadband projects, the comparison between co-financed and commercial investments is of limited use.

- 5.2.** Please describe precisely the identification strategy for the evaluation of the causal impact of the aid and the assumptions on which the strategy relies upon. Please describe in detail the composition and the significance of the control group.

The identification strategy will be defined by an external evaluator and described in detail in the study methodology. The control group will be telecommunications undertakings that have not received State aid under the aid scheme.

- 5.3.** Please explain how the envisaged methods address potential selection bias. Can it be claimed with sufficient certainty that observed differences in the outcomes for the aid beneficiaries are due to the aid?

Not applicable – the aid scheme covers only one economic sector (e-communications network market), while the support is neutral in terms of the list of potential beneficiaries – all telecommunications undertakings operating on the national telecommunications market will be able to apply for aid.

- 5.4.** If relevant, please explain how the envisaged methods intend to address specific challenges related to complex schemes, for example schemes that are implemented in a differentiated manner at regional level and schemes that use several aid instruments.

Not applicable – the programme is not a complex programme. The programme will be implemented at central level, involving telecommunications undertakings carrying out projects throughout the territory of Poland, divided into individual competitive areas where individual projects will be carried out.

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6 Please make reference to SWD(2014)179 final of 28.5.2014.

## 6. Gathering data

**6.1.** Please provide information on the mechanisms and sources used to collect and process data on the aid beneficiaries and the envisaged counterfactual scenario<sup>7</sup>. Please provide a description of all the relevant information that relates to the selection phase: data collected on aid applicants, data submitted by applicants and selection outcomes. Please also explain any potential issue as regards data availability.

The evaluator will use, inter alia, data collected in the following systems in the process of analysing legacy data:

- SIMBA (Monitoring, Research and Analysis Information System) project monitoring system, which collects data on broadband projects co-financed by public funds;
- The Telecommunications Helpdesk is an information system for collecting, processing, presenting and sharing information on telecommunications infrastructure, public telecommunications networks and co-location buildings.
- Fixed Broadband Information System (SIDUSIS) – a database that collects information on the availability of fixed internet services based on notifications from internet service providers and citizens.

The evaluator will also obtain other data from the institutions involved in the implementation of the programme and its beneficiaries (e.g. by means of a survey). Experience so far shows that there will be no problems with data availability.

**6.2.** Please provide information on the frequency of the data collection relevant for the evaluation. Are observations available on a sufficiently disaggregated level that is to say at the level of individual undertakings?

Most of the information will be collected at the level of individual companies through the above systems. In addition, the evaluator will be required to carry out quantitative and qualitative tests on the beneficiaries and the control group and thus collect data which are not collected during the programme monitoring process. The frequency of data collection depends on the system under which it is collected. The frequency is sufficient to use the data in the evaluation process.

**6.3.** Please indicate whether the access to the necessary data for conducting the evaluation might be hindered by laws and regulations governing confidentiality of data and how those issues would be addressed. Please mention possible other challenges related to data collection and how they would be overcome.

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<sup>7</sup> Please note that the evaluation might require sourcing of both historical data and data that will become progressively available during the deployment of the aid scheme. Please identify the sources for both types of information. Both types of data should preferably be collected from the same source as to guarantee consistency across time.

Access to data for formal reasons is not foreseen. To the extent that access to the data will not result from public databases or will not be possible under the applicable law, access to information will be ensured at the level of assistance agreements.

- 6.4.** Please indicate whether surveys of aid beneficiaries or of other undertakings are foreseen and whether complementary sources of information are intended to be used.

It is envisaged to examine beneficiaries, telecommunications companies and institutions involved in the implementation of the programme. Other sources of information may be proposed by the evaluator.

## **7. Proposed timeline of evaluation**

- 7.1.** Please indicate the proposed timeline of the evaluation, including milestones for data collection, interim reports and involvement of stakeholders. If relevant, please provide an annex detailing the proposed timeline.

Q1 2026 Developing documentation for the tender for the selection of the independent evaluator

Q2 2026 Conduct of a public procurement contract for the selection of an independent evaluator and signature of the contract

Q3 2026 Collection of data and preparation of a methodological report

Q3/Q4 2026 Collection of data, quantitative and qualitative studies

Q4 2026 Preparation of the Preliminary Report

Q1 2027 preparation of the final report

- 7.2.** Please indicate the date by which the final evaluation report will be submitted to the Commission.

Proposed date: 31 March 2027. Due to the limited duration of projects under the National Recovery and Resilience Plan, no assistance is foreseen after 30 June 2026. Broadband projects have a relatively long lead time and the biggest impact will come to the end of the project. For this reason, it is appropriate to submit a final report after the end of the programme.

- 7.3.** Please mention factors that might affect the envisaged timeline.

The implementation of the timetable may be influenced by:

- 1) Delay in the announcement and outcome of the competition, which will result in projects starting later.
- 2) Failure to tender for the selection of an evaluator (e.g. due to lack of bids)

- 3) Delay in the implementation of projects making it difficult to assess the impact of the projects.

## **8. The body conducting the evaluation**

- 8.1.** Please provide specific information on the body conducting the evaluation or, if not yet selected, on the timeline, procedure and criteria for its selection.

An independent evaluator selected in the public procurement procedure will be responsible for carrying out the evaluation. Preparation of the tender documentation and selection of the evaluator is planned for 2025 and 2026. It is envisaged to use an open tender for the selection of an evaluator. For potential contractors, criteria linked to the experience of the evaluation studies they will have to meet in order to apply for the contract will be defined. A price criterion and non-price criteria related to the proposed methodology, experience of the members of the evaluation team or the organisation of the study will be used for the selection of the contractor.

- 8.2.** Please provide information on the independence of the body conducting the evaluation and on how possible conflict of interest will be excluded during the selection process.

The evaluator will be selected through an open competitive tendering procedure. The persons involved in the selection of the contractor will be required to declare that, in the event of a conflict of interest, they will be excluded from the selection procedure.

- 8.3.** Please indicate the relevant experience and skills of the body conducting the evaluation or how those skills will be ensured during the selection process.

The required experience/skills will be specified in the tender documentation (see point 8.1).

- 8.4.** Please indicate which arrangements the granting authority will make to manage and monitor the conduct of the evaluation:

The tender documentation will specify how (working meetings, mail) and the frequency with which the evaluator is to report on the progress of the work. A working contact person will be identified in the contract with the evaluator to oversee the evaluation.

- 8.5.** Please provide information, even if only of an indicative nature, on the necessary human and financial resources that will be made available for carrying out the evaluation:

It is envisaged to involve at least 3 persons to carry out the contract and select the contractor. Working contacts with the evaluator will be carried out by at least 2 persons who will also be responsible for receiving the order. The cost of carrying out the study is estimated to be approximately PLN 100-200 thousand.

## 9. **Publicity of the evaluation**

- 9.1.** Please provide information on the way the evaluation will be made public, that is to say, through the publication of the evaluation plan and the final evaluation report on a website:

The evaluation plan and the final report of the evaluation will be published in the official government service gov.pl, in the NRP sub-pages and evaluation of public policies.

- 9.2.** Please indicate how the involvement of stakeholders will be ensured. Please indicate whether the organisation of public consultations or events related to the evaluation is envisaged:

The involvement of stakeholders (telecom operators, institutions involved in the implementation of the programme) will be the task of an independent evaluator. As a contractor, the analysis will receive letters of reference which will enable him to retrieve the data.

- 9.3.** Please specify how the evaluation results are intended to be used by the granting authority and other bodies, for example for the design of successors of the scheme or for similar schemes:

As with the evaluation of the previous similar aid scheme (SA.4 3484) concerning the co-financing of the network, this evaluation will also be used to design possible further public interventions in this regard.

- 9.4.** Please indicate whether and under which conditions data collected for the purpose or used for the evaluation will be made accessible for further studies and analysis:

The data collected by the evaluator will be made available in the form of a report. No further sharing of source data is envisaged, apart from the obligation to make them available under generally applicable law.

- 9.5.** Please indicate whether the evaluation plan contains confidential information that should not be disclosed by the Commission:

The evaluation plan shall not contain confidential information.

## 10. **Other information**

- 10.1.** Please indicate here any other information you consider relevant for the assessment of the evaluation plan:

Absence

**10.2.** Please list all documents attached to the notification and provide paper copies or direct internet links to the documents concerned:

- 1) Aid scheme ‘Regulation of the Minister for Digitalisation of 7 December 2022 on the granting of aid for broadband infrastructure under the National Recovery and Resilience Plan’ <https://dziennikustaw.gov.pl/DU/2022/2604>
- 2) The report ‘Analysis of the effects of public interventions undertaken so far on the basis of the aid programme for priority axis I of the Digital Poland Operational Programme 2014-2020 and the evolution of the telecommunications market in Poland during the implementation of the programme. Phase II’ [https://www.polskacyfrowa.gov.pl/media/91289/POPC\\_analiza\\_interwencjapubliczna\\_24062020.pdf](https://www.polskacyfrowa.gov.pl/media/91289/POPC_analiza_interwencjapubliczna_24062020.pdf)