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#### **Overview**

- ECTA supports the creation of a roaming surcharge-free continent
- The timeframe to get there
- Fair use of international roaming services
- Wholesale regulation
  - Structural solutions for the separate sale of roaming
  - Wholesale tariffs
- Offers without international roaming

# ECTA supports the creation of a roaming surcharge-free Europe

ECTA is supportive of the objective to abolish excessively high roaming charges for end-users and to create a positive roaming experience for consumers travelling across borders. Therefore we support a gradual path leading to a "roam-like-at-home"(RLAH) scenario under competitive conditions, enabling all operators (and not only dominant operators with large footprint) to effectively compete.

#### Timeframe to get there

- Operators need approximately 1,5 years to prepare their commercial offers & adapt IT systems
- In order to design commercial offers clarity on wholesale regulation is needed ideally at the same time as the retail regulation but at least approx. 1,5 years before the entry into force of the zero roaming surcharge retail regulation
- Progressive introduction of RLAH is recommended

# Fair use of international roaming services

- BEREC to design basic fair use rules (retail and/or wholesale level) in order to prevent permanent/abusive roaming
- Competition should be promoted & enabled to provide choice of roam-like-at-home offers to end-users with different fair use scenarios meeting their needs
- BEREC should review the appropriateness of the basic fair use rules regularly in order to ensure that they reflect market reality & developments

# Wholesale regulation: structural solutions

- The objective of structural solutions was to introduce price competition in roaming services and thereby to drive lower, competitive roaming prices
- If roaming surcharges for end-users are phased out by law structural solutions for the separate sale of roaming services are redundant
- Investments made in structural solutions are also unnecessary and redundant
- The obligation on structural solutions for the separate sale of roaming services should be deleted simultaneously with the introduction of RLAH

# Wholesale regulation: tariffs

- The regulation of retail roaming charges (i.e. zero surcharges principle) should be always accompanied by wholesale tariff regulation
- There should be clarity on the level of applicable wholesale tariffs at least approx. 1,5 years prior to the entry into force of the zero retail surcharge principle
- The harmonisation of MTRs leading to a single European MTR cap is a prerequisite to achieving RLAH

# Wholesale regulation: tariffs

 Most challenger operators (MNOs & MVNOs) support the reduction of wholesale caps for voice, SMS and data roaming at the same time as the retail principle of zero roaming surcharges is introduced in order to ensure that all operators are able to provide RLAH offers

 Some MNOs in particular with a South-European footprint and/or high volumes of inbound roaming traffic consider the current level of regulated wholesale charges appropriate

#### Offers without international roaming

- In order to maintain very low cost offers demanded by end-users in some markets that are
  - typically not used for international roaming and
  - do not support a business case for RLAH
- Offers up to a pre-defined very small amount per month should not be required to include international roaming services