

1&1 Telecom contribution to the BEREC Call for Inputs on interfaces for mobile networks for developers and third-party services

We welcome BEREC's initiative to examine the development of network application programming interfaces (APIs) and their potential to make mobile network capabilities available to third-party developers and the wider digital ecosystem.

Standardisation initiatives such as CAMARA and GSMA Open Gateway are relevant to developing common approaches and interfaces and may support interoperability, scalable services, and broader participation by different market players. At the same time, network APIs remain in the early stages of development. The necessary technical capabilities and interfaces still need to be developed and integrated, while viable ecosystems, business models and demand potential remain to be validated. Against this background, we currently do not see a need for additional regulatory measures. Nor do we see evidence of significant market-entry barriers, market foreclosure, or the exercise of market power by individual providers in a way that would harm competition. Further regulatory intervention should be considered only if concrete competition or market problems emerge.

Our responses to BEREC's questions are set out below.

Q1. What roles has each player in this complex ecosystem: MNOs, MVNOs, MVNEs, Aggregators, network vendors, CPaaS providers, Channel providers, Developers, cloud providers, end users, etc.? *No specific input.*

Q2. Can you provide any publicly available information on (current/future) market demand analysis, market prediction/projection and market development? *Network APIs remain at an early stage of development. Business cases and demand potential remain to be validated. From our perspective, market development is currently constrained more by the maturity of use cases and demand than by regulatory factors.*

Q3. Can you provide any publicly available information on business models and successful pricing models? *No specific input.*

Q4. In what way can Open APIs enable or support a dynamic and well-functioning European market of both application service developers and providers as well as telecom service providers? *Industry initiatives such as CAMARA and GSMA Open Gateway have established common standards and interfaces. Such standardization can support interoperability across market participants and facilitate the development of scalable and interoperable services across networks and markets.*

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Q5. How can the adoption of network APIs be accelerated? *Priority should be given to developing the necessary technical capabilities and interfaces. Ecosystem development and broader market adoption should be driven through practical implementation and validation of use cases. Additional regulatory measures do not appear necessary at this stage.*

Q6. What are the main drivers for the successful adoption of Open APIs in Europe? *Key drivers include the availability of common and interoperable standards, the development of viable business cases and demand, and technical readiness across market participants.*

Q7. What are the main technical and commercial challenges, from the perspective of MNOs, MVNOs, MVNEs, Aggregators, network vendors, CPaaS providers, Channel providers, Developers, cloud providers, end users, etc.? *The main challenges relate to developing the required technical capabilities, integrating interfaces into network environments, building viable ecosystems involving relevant market participants, and validating sustainable business models and demand potential. From our perspective, these challenges are currently more significant than any regulatory issues.*

Q8. Do you see any regulatory challenges, for instance, with regard to enabling certain APIs or an evolution towards a well-functioning market? *We currently do not see a demonstrated need for additional regulatory measures. Nor do we see evidence of significant market-entry barriers, market foreclosure or the exercise of market power that would justify regulatory intervention at this stage. Any future intervention should be based on concrete and demonstrable competition or market failures.*

Q9. To what extent are the current APIs truly interoperable across operators with network equipment from different vendors in Europe? Are there differences in interoperability between certain application sectors or other aspects? *Industry initiatives such as CAMARA and Open Gateway are intended to promote interoperability across operators and vendors. However, given the early stage of deployment and limited commercial experience, it is currently premature to draw firm conclusions regarding the practical degree of interoperability across different network and vendor environments.*