

Apple Inc. (Apple) Response to BEREC's Draft Work Programme 2026 (BoR (25) 136)

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Apple welcomes the opportunity to provide input to BEREC's Draft Work Programme 2026 (BoR (25) 136). Apple supports BEREC's continued efforts to promote efficient spectrum use, secure and resilient connectivity, sustainable digital infrastructure, and a competitive and innovative communications ecosystem across the European Union.

As a global provider of devices and services that rely on both licensed and licence-exempt spectrum, Apple particularly welcomes BEREC's planned work on:

- coexistence of wireless access systems (WAS/RLAN) and mobile/fixed networks,
- the development of frameworks for direct-to-device (D2D) satellite communications and hybrid networks, and
- the ongoing assessment of open interfaces, network slicing, and quality of service under the Open Internet Regulation.

1. Spectrum and Coexistence: Efficient Use of Wireless Access Systems

Apple strongly supports BEREC's recognition of the importance of unlicensed and shared spectrum access and hybrid connectivity solutions. Licence-exempt wireless access systems (WAS/RLAN) play a key role in global connectivity, complementing licensed mobile networks, and driving innovation in devices and services.

Extensive technical studies have shown that WAS/RLAN systems can coexist with incumbent fixed and mobile services when appropriate conditions (e.g., power limits, dynamic interference mitigation) are applied. This record supports the case for regulators to continue enabling licence-exempt access under spectrum sharing models, which deliver high performance and cost-effective connectivity to consumers and enterprises.

To this end, Apple encourages BEREC and national regulators to support spectrum policy that recognises the efficient coexistence capabilities of WAS/RLAN and avoids disproportionate constraints on licence-exempt use in favour of licensed systems based solely on unsubstantiated future capacity projections.

2. Direct-to-Device Satellite Communications and Hybrid Networks

Apple welcomes BEREC's intention to study direct-to-device (D2D) satellite communication and hybrid networks combining terrestrial and non-terrestrial components. These developments will expand connectivity to underserved areas, improve resilience, and enable safety-critical services such as emergency messaging.

Apple supports a technology-neutral approach to D2D communications that allows integration of non-terrestrial networks (NTN) within existing mobile standards (3GPP Rel-17 and beyond).

Harmonised and flexible spectrum frameworks are essential to ensure that D2D services can operate seamlessly across the EU while maintaining user safety, privacy, and interoperability.

3. Interfaces to Mobile Networks and Developer Access

Apple notes BEREC's plan to launch a call for input on interfaces to mobile networks for developers and third-party services. The success of Europe's digital ecosystem depends on balancing innovation and openness with security, privacy, and user consent.

Apple supports the development of interoperable, transparent frameworks that allow innovation while preserving the integrity of device platforms and networks. Any new regulatory guidance should ensure that developer access to mobile network functions is voluntary, standards-based, and privacy-protective, consistent with existing user-centric safeguards on mobile operating systems.

4. 5G Network Slicing and the Open Internet Regulation

BEREC's forthcoming work on network slicing and its compatibility with the Open Internet Regulation is timely. Apple encourages a balanced interpretation that allows innovative, differentiated services, such as low-latency AR/VR or industrial applications, while ensuring end-users continue to enjoy open and non-discriminatory access to the Internet.

Network slicing should be treated as a technical enabler of service differentiation, not as a mechanism for user-level discrimination. Apple supports BEREC's continued engagement with industry stakeholders to clarify these principles.

5. Sustainability and Energy Efficiency

Apple recognises BEREC's leadership in examining the environmental impact of electronic communications. Apple remains committed to its goal of carbon-neutral products and supply chains by 2030 and supports the development of evidence-based, technology-neutral sustainability metrics for digital infrastructure and devices.

Conclusion

Apple appreciates BEREC's open and consultative approach to shaping Europe's connectivity policies. The initiatives in the Draft Work Programme 2026 have the potential to strengthen Europe's wireless ecosystem, promote innovation, and enhance consumer benefit.

Apple stands ready to contribute technical expertise and global experience to BEREC's upcoming workstreams, particularly on:

- efficient coexistence of WAS/RLAN and licensed networks,
- direct-to-device and hybrid connectivity frameworks, and
- open interface and network slicing policy guidance.