



## 4iG's Response to BEREC draft Strategy 2026-2030

4iG Plc welcomes the publication and the opportunity to provide feedback on the draft Strategy 2026-2030 (*Strategy*).

### INTRODUCTION

4iG Plc (*4iG*) is a Hungarian majority-owned company headquartered in Budapest and listed on the Budapest Stock Exchange, and it fulfils the role of the parent company of a leading regional telecommunications group in Hungary and in the Western Balkans (*4iG Group, Group*). The 4iG Group is a rapidly expanding regional telecommunications group that has grown to become the largest integrated information and communications technology provider in Hungary, as well as an emerging regional leader across the Western Balkans.

In line with market changes, the group is constantly expanding its services, professional staff and portfolio. The group's integrated telecommunications, IT, space, and technology services give it a significant competitive advantage over traditional IT and telecommunications companies. Its unique expertise and integrated services distinguish the group from its domestic and international competitors. **The 4iG Group currently has 28 subsidiaries in four countries and employs around 8,000 people.**

The Group's commercial structure is based on three pillars. The 4iG Group has become one of the region's leading **telecommunications** service providers with most of its revenue coming from this sector. The eight telecommunications companies (*One Magyarország Zrt., DIGI Távközlési és Szolgáltató Kft., Invitech ICT Services Kft., AH Média Kereskedelmi Zrt., D-Infrastruktúra Távközlési Kft., AH Infrastruktúra Szolg. Zrt., V-Hálózat Távközlési Zrt., Invitech ICT Infrastructure Kft.*) delivers nationwide fixed and mobile connectivity and wholesale services. 4iG's telecommunications services are based on a significant infrastructure. The group has a 35,200-kilometer fixed network and 4,275 transmission towers, base stations and relay stations in its service areas in Hungary and the Western Balkans that positions 4iG at the forefront of emerging resilient-network architectures.

The 4iG Group currently operates mobile networks in three European markets and fixed networks in two. In its home market of Hungary, the group is the leading ICT integrator and broadcaster, as well as the second-largest nationwide telecommunications operator. It serves more than 3 million mobile subscribers and over 4 million fixed-line subscribers in Hungary. In Albania and Montenegro – both of which are EU candidate countries – 4iG's subsidiaries, One Albania and One Crna Gora, are the leading nationwide mobile operators, adding a further 2.5 million customers. The Group therefore reaches a total of around 5 million mobile and 4.3 million fixed-line subscribers across these regions, providing it with a uniquely broad perspective on connectivity challenges within the EU and neighbouring candidate countries.

The Group is also heavily involved in EU policy processes. It is an active member of Connect Europe, GSM Association, Digital Europe and contributes operator-level expertise to debates



especially on **spectrum management, roaming, open network architectures, 5G and gigabit infrastructure deployments.**

It is essential that BEREC supports measures promoting harmonisation through **deregulation and simplification**, as this will help reduce fragmentation and complexity for operators entering different markets. It may be beneficial for the harmonisation of procedures to be based on best practice within national regulations, with the **involvement of national regulators**, in a way that is overseen by BEREC. It is worth considering that a 'top-down', top-driven approach to harmonisation, which may not fully consider national practices and the reasons behind their emergence, may potentially lead to implementing more challenging regulatory mechanisms. In this context, while we see clear benefits in harmonisation efforts (e.g. timing of spectrum auctions), we believe that this should be pursued while preserving the governance of national authorities.

The following suggestions are therefore offered from national and regional perspectives based on the Group's experience relating to the priorities of the Strategy.

#### **ad 1. Promoting full connectivity and the Digital Single Market**

4iG Group fully agrees that the digital infrastructure of the European Union (EU) has to be up to the edge in terms of high quality as well as innovative services and wide European availability and full connectivity. The digital infrastructure, including full fibre and 5G networks as well as cloud networks have to serve citizens and businesses of the EU.

In our view coverage of **5G SA should primarily be determined by market competition and demand**, and in this context, we believe that the decision to deploy it should **remain at the discretion of the operators.**

Regarding the copper-switch off we welcome the intention of the copper switch-off, and the target dates of 2028 and 2030 in the Digital Decade Policy Program 2030 but **we do not yet see the resources being secured.** We believe that the replacement of resilient networks certainly cannot be achieved without support as the costs of new substructure construction are extremely high therefore, **the Strategy should put more emphasis on financial incentives as well.** Further the choice of implementation of copper switch-off should be the discretion of operators.

In relation to **spectrum policy** the 4iG Group fully believes that spectrum management and authorisation procedures **must remain the responsibility of the Member States, while only a limited level of co-ordination should be ensured and further strengthened at the EU level.**

As concerns **submarine cables** we are of the opinion that **new routes need to be developed** in order to effectively address the challenges posed by the existing infrastructure and to build a resilient subsea cable network in Europe. The **Western Balkans** could be a key area for the development of new subsea cable entry points from Asia which could be a catalyst for the economic development of the area and would accelerate the digital development of the Western Balkans, smoothing their way to join the EU's Digital Single Market.



Finally, we support BEREC to play fundamental role in relation to the Roaming Regulation and the implementation of Gigabit Infrastructure Act (GIA).

#### **ad 2. Supporting Competition-Driven and Open Digital Ecosystems**

Regarding this point we support the Connect Europe's response in this regard **drawing attention to the regulatory asymmetries between Internet Service Providers (ISPs) and Content and Application Providers (CAPs)**. We also believe that existing regulatory and bargaining asymmetries in the internet value chain should be addressed.

#### **ad 4. Contributing to environmentally sustainable, secure and resilient digital infrastructures**

4iG Group is fully committed to ensure a secure and resilient infrastructure whereas we are of the opinion, that **EU's cybersecurity requirements for the telecoms sector are already quite demanding**. Regarding the matter of third-country suppliers **we are opposing making the EU Toolbox for 5G Security legally mandatory**. Regulating the number of vendors based on technical and especially non-technical criteria could lead to an even tighter supply situation. This would likely result in a slower rollout of networks, higher costs and less time for genuine innovation. Rather than imposing bans and restrictions, we believe that **stimulating diversification within the vendor ecosystem would be more productive, particularly by supporting Open RAN initiatives**.

While we acknowledge the importance of environmentally sustainable infrastructure, we wish to highlight the need for incentives that help offset the energy costs incurred by telecom operators.

#### **ad 5. Strengthening BEREC's Capabilities and Continuous Improvement**

We welcome BEREC's efforts to put more emphasis on transparency. We support BEREC to be more open and transparent regarding its processes. We would welcome more information and explanation how stakeholder opinions are evaluated, including clear reasoning when suggestions are accepted or rejected.

Budapest, 15<sup>th</sup> of July 2025.

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