



Response to BoR (25) 80

BEREC Strategy 2026 – 2030

15 July 2025

1. MVNO Europe, the association representing Mobile Virtual Network Operators (MVNOs), expresses its support for the proposed BEREC Strategy 2026 – 2030, BoR (25) 80, and asks BEREC to resist any pressure to change proposed Strategic Priorities 1, 2, and 3.
2. Strategic Priorities 1, 2 and 3 must remain BEREC's sole guiding principles, in line with Article 3(2) of the European Electronic Communications Code, the BEREC Regulation, the Roaming Regulation, the Open Internet Regulation, and the Gigabit Infrastructure Act, for at least as long as this remains the applicable legal framework. There should be no extension beyond these 3 Strategic Priorities, since these are the priorities which reflect applicable EU legislation.
3. MVNO Europe wishes to take this opportunity to thank BEREC for its strong response to the European Commission's Call for Evidence on the Digital Networks Act.
4. The above being stated, MVNO Europe considers that BEREC can and should do more, in the Strategy 2026 – 2030, and in other upcoming BEREC deliverables, and through BEREC's engagement with EU institutions, to:
 - a. Acknowledge the positive role of MVNOs in the EU's electronic communications markets: (i) providing competitive impetus and end-user benefits in many Member States, (ii) being multi-country operators serving consumers, SMEs and industry and (iii) key contributors to the EU Single Market, notably given that MVNOs focused on Machine-to-Machine communications (M2M), Internet of Things (IoT) and Connected Vehicle connectivity are delivering pan-European services today, in accordance with the existing framework. In this context, MVNO Europe emphasises that, in the absence of fit-for-purpose wholesale mobile access, there can be no realistic expectation of achieving a genuine EU Single Market for electronic communications (not for MVNOs, and in fact also not for MNOs, since all MNOs active in IoT markets rely on wholesale access including permanent roaming, just as MVNOs do). Specifically, regarding *page 7, para 2/top of page 8*, MVNO Europe asks BEREC to amend the text and recognise the points made in this MVNO Europe response.
 - b. Lead by example, by delivering, jointly with NRAs, and before the issuance of the EC legislative proposal for a Digital Networks Act, substantive simplification/harmonisation of notification requirements, conditions associated with the status of authorised operator, and recognition that Business-to-Business, M2M/IoT/Connected Vehicle Connectivity providers are Single Market operators, which already deliver real benefits to the European economy, and to Europe's competitiveness, but need a single set of operating conditions, coordinated by BEREC.

