

Public Consultation on the Europe's Telecom Reality Check: Draft BEREC

Fact finding report on connectivity, competition and regulatory highlights

in different jurisdictions

Fields marked with * are mandatory.

General information

During the 66th BEREC ordinary meetings (12-13 March 2026), the Board of Regulators adopted the Europe's Telecom Reality Check: Draft BEREC Fact finding report on connectivity, competition and regulatory highlights in different jurisdictions (BoR (26) 36) for public consultation.

With the draft report, BEREC provides its view of where the EU stands in terms of connectivity, network quality, performance and pricing, compared to other jurisdictions. This fact-finding report is meant to provide an objective representation of several elements of the competitive context of telecommunications in Europe. It covers aspects such as the deployment of fixed and mobile fast broadband networks, services' supply, financial performance of telecom operators, as well as regulatory approaches.

You are hereby invited to participate in the below public consultation on the draft report.

Your details

* Please select the language of your contribution:

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English

- ☐ Estonian
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- ☐ Slovenian
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* First name

* Surname

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Organization name *(in case you are replying on behalf of your organization)*

Date

☒ I agree with the personal data protection provisions

Practical details of the public consultation

Stakeholders are invited to comment and provide their views on the different chapters of the draft report following its structure:

- Chapter 1 Introduction
- Chapter 2 Coverage of broadband networks and services penetration
- Chapter 3 Pricing and quality of broadband services provision
- Chapter 4 Perspectives related to the consumption of broadband services (urban/rural)
- Chapter 5 Comparative assessment of telecommunications access regulation
- Chapter 6 Consolidation trends and implications for telecoms
- Chapter 7 Overview of financial indicators
- Chapter 8 Conclusions
- Annex I - Service diversity

Stakeholders may also upload a document as a part of their contribution, see below.

In order to facilitate the processing of the responses, the comments provided **should clearly refer to certain sections/subsections/paragraphs of the draft report.**

Contributions should **preferably be sent in English.**

Stakeholders may submit their contributions **by Friday, 8 May 2026, close of business.**

In accordance with the BEREC policy on public consultations, BEREC will publish all contributions and a summary of these contributions, respecting confidentiality requests. In that regard, any request for reduction of the text on confidentiality grounds should clearly indicate which information is considered confidential and be accompanied by a non-confidential version.

Public consultation

Please indicate comments on the **Chapter 1 "Introduction":**

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AIIP supports BEREC's objective of providing an evidence-based comparison between the EU and other jurisdictions. This is particularly important at a time when parts of the policy debate tend to assume, without sufficient proof, that the European telecommunications sector is structurally weak because it has too much competition and too little consolidation.

International benchmarking is useful only if the institutional, geographic and market differences between jurisdictions are kept clearly in view. The United States, China, Japan, South Korea, Australia and the United Kingdom follow very different regulatory and industrial models. Their experiences cannot be selectively used to justify regulatory shortcuts in Europe.

AIIP therefore suggests that Chapter 1 should stress more explicitly that the European framework has produced a distinctive balance between investment, affordability, service diversity and end-user protection. This balance is based on ex-ante regulation, wholesale access, competition between different categories of operators and a plural structure of the market. These elements should not be treated as historical constraints, but as core European assets.

In particular, the report should avoid any implicit reading according to which the existence of many operators is a weakness. In several Member States, including Italy, medium-sized territorial operators are essential for local investment, business connectivity and the development of areas that would not be served with the same quality or speed by large national operators alone.

Please indicate comments on the **Chapter 2 "Coverage of broadband networks and services penetration"**:

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AIIP welcomes BEREC's finding that the EU has made significant progress in both FTTP and 5G coverage and that European performance is broadly comparable with several global peers. The report correctly shows that coverage and take-up vary widely across Member States and that demand-side, structural and market-specific factors affect penetration.

AIIP suggests, however, that BEREC should complement household-based FTTP coverage indicators with indicators reflecting actual serviceability and operational availability. A household or business may be theoretically passed by fibre while still facing long provisioning times, operational failures, insufficient wholesale processes or limited upgrade possibilities. This is particularly relevant for alternative operators relying on wholesale inputs and for SMEs requiring reliable connectivity rather than merely nominal availability.

Coverage indicators should also better reflect the contribution of medium-sized and territorial operators. In Italy, such operators frequently connect industrial districts, business parks, small municipalities, tourism areas, agricultural sites and dispersed settlements through a combination of fibre, fixed wireless access, local backbone networks and dedicated business links. Their role is not always visible in indicators focused on nationwide coverage or residential households.

AIIP also recommends that BEREC should distinguish more clearly between nominal coverage and actual usable capacity. The availability of access infrastructure is only one part of the picture. Backhaul capacity, redundancy, concentration at local points of presence, peering and transport architecture affect the real quality of the service delivered to end users. Penetration and coverage analysis should therefore not be separated from the technical conditions under which services are actually activated and maintained.

Finally, while FTTP is rightly central to the analysis, Europe should not ignore the role of fibre-backed fixed wireless access and other local connectivity solutions in specific territorial contexts. These solutions can be essential in areas where immediate FTTP deployment is economically or physically difficult, provided that they are engineered with adequate backhaul and transparent quality parameters.

Please indicate comments on the **Chapter 3 "Pricing and quality of broadband services provision"**:

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AIIP strongly supports BEREC's conclusion that the EU offers very competitive value for money in both fixed and mobile broadband services. The report confirms that European consumers often benefit from significantly lower prices than consumers in other major jurisdictions, while receiving improving coverage and competitive quality indicators.

At the same time, AIIP suggests that the assessment of quality should go beyond advertised download speeds and consumer-initiated speed tests. For residential users, and even more for SMEs and business customers, quality depends on upload capacity, latency, jitter, packet loss, repair times, service level agreements, routing quality, peering, redundancy, customer support and the real degree of network contention.

A central point is that not all "fibre" offers are technically equivalent. A 1 Gbps service delivered over a heavily oversubscribed access segment, with insufficient backhaul or weak concentration architecture, is not equivalent to a 1 Gbps service delivered over a well-dimensioned local network with adequate backhaul and low contention. The market should therefore move toward greater transparency on the underlying technical conditions of the service, not merely on the advertised access technology.

Medium-sized territorial operators often apply lower overbooking ratios than mass-market operators, especially in business areas and local networks where reputation, support and long-term customer relationships are decisive. This should be recognised in the quality debate. Parameters such as customers per capacity unit, backhaul dimensioning, local PoP capacity and oversubscription ratios can be highly relevant to the actual user experience.

AIIP therefore recommends that BEREC encourage more transparent quality indicators for fixed broadband offers, including the declaration of the underlying access architecture where relevant, the dimensioning of backhauling, and contention-related parameters in a form that is understandable and comparable. Fibre is not "all the same" simply because the word fibre appears in a commercial offer.

This is also important for competition. If quality is reduced to advertised speed alone, operators investing in better engineered networks, lower contention and stronger local support are not properly recognised by the market. A more complete quality framework would reward real investment and discourage purely cosmetic upgrades of commercial offers.

Please indicate comments on the **Chapter 4 "Perspectives related to the consumption of broadband services (urban/rural)":**

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AIIP welcomes BEREC's analysis of the urban-rural divide and agrees that national averages can hide important territorial differences. In the Italian context, the distinction between urban and rural areas is useful but not sufficient. Many critical connectivity needs arise in intermediate areas: industrial districts, logistics zones, tourism locations, agricultural areas, mountain communities, small municipalities and dispersed productive sites.

AIIP suggests that BEREC distinguish more clearly between residential rural coverage and productive territorial coverage. A rural household indicator may not fully capture the needs of SMEs, farms, factories, warehouses, local public services and industrial parks. These users often require symmetric capacity, low latency, redundancy, Wi-Fi support, private local networks, and rapid technical assistance.

In this context, AIIP believes that Europe should also support a more open approach to private 5G and local wireless networks. If private 5G remains effectively controlled only by mobile network operators, it risks remaining expensive, limited in deployment and poorly adapted to many local industrial and agricultural use cases. Private 5G should be available, under a harmonised European framework, also to fixed operators wholesaled, system integrators, industrial users, agricultural operators and local network specialists.

A harmonised European regime for licence-exempt or light-licensed spectrum suitable for local private 5G would strongly support the real development of this technology. It would allow factories, logistics platforms, ports, farms, campuses and private industrial zones to deploy local networks in combination with fibre backhaul and Wi-Fi. In agricultural areas, private 5G may also support sensor networks, automation and Wi-Fi extension where traditional indoor models do not apply.

This approach would not replace public mobile networks. It would complement them. The policy objective should be technological plurality: FTTP, fixed wireless access, Wi-Fi, private 5G and local fibre networks should all be available where they are technically and economically appropriate. Reducing every wireless policy objective to public mobile operator networks would be a mistake and would limit innovation at the edge of the economy.

Please indicate comments on the **Chapter 5 "Comparative assessment of telecommunications access regulation"**:

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AIIP strongly supports BEREC's recognition of the EU ex-ante access framework as a pro-competition and pro-investment tool. Access regulation is not an obstacle to investment. In many Member States, it is the mechanism that allows alternative operators to enter the market, climb the investment ladder, develop their own infrastructure and serve customers that would otherwise have fewer choices.

AIIP suggests that BEREC should place greater emphasis on the distinction between formal wholesale access and effective wholesale access. The mere existence of a reference offer is not sufficient. Access must be operationally usable, non-discriminatory in practice, supported by reliable information systems, subject to measurable provisioning and repair times, and protected by effective remedies against strategic delays, margin squeeze and discriminatory treatment.

This is particularly relevant for medium-sized operators. Their ability to compete depends not only on regulated prices, but also on operational quality, migration processes, fault management, access to passive infrastructure, access to ducts, poles, chambers, in-building wiring, dark fibre where appropriate, and reliable backhaul options. If these elements are weak, wholesale access may exist on paper while failing in practice.

AIIP also recommends that BEREC assess wholesale-only and separated models with operational realism. A wholesale-only structure is not automatically efficient or pro-competitive. It must be judged on actual performance: provisioning, assurance, transparency, non-discrimination, availability of technical information, escalation procedures, and the ability of retail operators to serve final users without being trapped in inefficient processes.

The comparison with other jurisdictions confirms that the European model has produced greater service diversity and consumer choice than purely ex-post or highly concentrated models. Europe should therefore strengthen effective access regulation rather than dilute it. The objective should be more infrastructure plurality, more operational transparency and more room for local and medium-sized operators to invest.

Please indicate comments on the **Chapter 6 "Consolidation trends and implications for telecoms"**:

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AIIP fully agrees with BEREC that consolidation should not be treated as an industrial policy objective in itself. The evidence reviewed by BEREC does not support the claim that Europe needs a small number of pan-European telecommunications groups in order to invest, innovate or compete globally.

Scale can be useful in some circumstances, but it is not a substitute for local investment, technical competence and territorial presence. A larger corporate perimeter does not reduce the cost of civil works in a municipality, does not simplify permits, does not automatically improve repair times, does not dimension a local backhaul network, and does not by itself connect an industrial district. These activities require operators with local knowledge, engineering capacity and direct responsibility toward customers.

AIIP therefore supports BEREC's warning that uncontrolled consolidation may lead to tighter oligopolies, higher prices and weaker competitive pressure. This is particularly important in a market where consumers and SMEs have benefited from plurality, wholesale access and the pressure exerted by alternative operators.

The experience of large operators divesting from secondary markets also shows that cross-border scale does not automatically deliver the expected benefits. In many cases, operators refocus on core markets because the theoretical advantages of scale do not compensate for local complexity, limited synergies or weak business opportunities. This confirms that the policy debate should not confuse financial concentration with productive investment.

AIIP asks BEREC to make explicit that medium-sized and local operators are not an obstacle to the European single market. They are one of its strengths. They invest in places and customer segments that may not be priorities for large groups, they provide competitive pressure, and they preserve the economic plurality that has made European telecommunications affordable and dynamic.

Current merger control rules already allow consolidation where it is justified and not harmful. There is no need for a special relaxation of competition rules in favour of telecommunications groups. Any weakening of merger scrutiny would risk transferring value from consumers, SMEs and alternative operators to a small number of large shareholders, without a reliable guarantee of additional investment.

Please indicate comments on the **Chapter 7 "Overview of financial indicators":**

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AIIP welcomes BEREC's finding that the available financial evidence does not justify a weakening of regulation or merger control. The report correctly notes that European operators generally show stable margins, improving cash flow perspectives, returns above the cost of capital in many cases, and a capex cycle that has already peaked in several markets.

AIIP suggests, however, that financial indicators should be disaggregated more carefully by operator category. Large listed incumbents, integrated mobile groups, wholesale-only network operators, cable operators, alternative fibre investors, regional operators and medium-sized ISPs have different financing structures, cost bases, investment horizons and risk profiles. The financial position of large groups cannot be used as a proxy for the entire sector.

In particular, the financial challenges of some large operators should not be automatically attributed to excessive competition or regulation. They may also reflect debt levels, past acquisitions, dividend policies, spectrum costs, inefficient structures, legacy assets, strategic errors or expectations of financial markets. Public policy should not compensate for these choices by reducing competition or weakening wholesale obligations. AIIP also recommends that BEREC place greater emphasis on the investment made by challengers and territorial operators. In several markets, these operators have contributed significantly to fibre deployment, business connectivity, fixed wireless access, local backbone infrastructure and data centre interconnection. Their investment is often more directly linked to productive territories and SMEs than the financial indicators of large multinational groups suggest.

A sound financial analysis should therefore distinguish between investment that expands useful network capacity and financial operations that primarily support consolidation or shareholder returns. Regulation should reward efficient, real, territorial investment, not market power.

For AIIP, the conclusion is clear: there is no financial basis for a bonfire of regulation, for merger control relaxation, or for policies that would shift rents toward a few large operators. The priority should instead be effective access, fair wholesale conditions, reduction of deployment barriers and protection of the investment capacity of independent operators.

Please indicate comments on the **Chapter 8 "Conclusions"**:

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AIIP supports the main conclusion of the draft report: competition and the regulatory framework enabling it are primary drivers of investment, innovation and sectoral progress in Europe. The report provides important evidence that the European telecommunications model delivers affordability, service diversity, improving coverage and solid investment dynamics.

AIIP encourages BEREC to express this conclusion even more clearly. The policy debate should move away from the narrative that Europe suffers from too much competition. The evidence points in the opposite direction: competition has protected consumers, supported investment and allowed a plurality of operators to contribute to connectivity.

The future European framework should therefore avoid measures that would reduce market plurality, weaken wholesale access, relax merger control without strong evidence, or design the sector around a small number of very large operators. Such an approach would risk higher prices, less choice, weaker local investment and reduced attention to SMEs, industrial districts and territorial needs.

AIIP believes that the correct policy priorities are different: effective and enforceable access regulation, transparent quality indicators, access to passive infrastructure, removal of practical barriers to deployment, support for local and regional network investment, and recognition of the role of fixed operators, integrators and end users in private wireless networks.

Europe's strength is not a uniform oligopoly. It is a plural ecosystem of operators, technologies and territories. This plurality should be treated as a strategic asset, not as a defect to be corrected.

Please indicate comments on the **Annex I "Service diversity"**:

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AIIP welcomes Annex I and the attempt to compare service diversity across jurisdictions. This is an important element of the report because service diversity is one of the clearest results of the European regulatory model.

AIIP suggests, however, that service diversity should not be measured only by the number of nationwide offers or by mobile market shares. In countries such as Italy, regional and medium-sized operators provide a significant contribution to infrastructure plurality, business services, local fibre deployment, fixed wireless access, data centre connectivity, backhaul, redundancy and territorial digital autonomy. This contribution may be underestimated if the analysis focuses mainly on large national operators.

The report should distinguish more clearly between different types of providers: pure resellers, infrastructure-based regional operators, fixed wireless operators, business connectivity providers, wholesale buyers investing in their own network elements, wholesale-only operators, mobile operators and integrated fixed-mobile groups. These categories play different roles and have different effects on competition and investment.

AIIP also suggests that BEREC include qualitative indicators of diversity, not only quantitative indicators. For example, the existence of multiple brands does not necessarily mean strong competition if they depend on the same bottleneck infrastructure under weak operational conditions. Conversely, a medium-sized operator with its own fibre backbone, local PoPs, fixed wireless infrastructure, business support and data centre connectivity may provide a level of competitive pressure that is not visible in national market share tables.

Service diversity should therefore be understood as infrastructure, operational and commercial plurality. This is particularly relevant for SMEs and productive areas, where the quality of the operator, the engineering of the network and the responsiveness of support can matter more than the nominal number of national offers available to households.

AIIP recommends that Annex I be strengthened accordingly, so that the contribution of local and medium-sized operators to European competition and connectivity is properly reflected.

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Thank you for your participation in this public consultation!

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