



ecta RESPONSE

**TO THE PUBLIC CONSULTATION BY BEREC
ON THE**

**DRAFT BEREC FACT FINDING REPORT ON CONNECTIVITY,
COMPETITION AND REGULATORY HIGHLIGHTS IN
DIFFERENT JURISDICTIONS**

BOR (26) 36

8 MAY 2026

1. Introduction

1. **ecta**, the **European competitive telecommunications association**,¹ welcomes the opportunity to comment on the draft BEREC Fact Finding Report on connectivity, competition and regulatory highlights in different jurisdictions, BoR (26) 36 (hereafter “draft BEREC Fact Finding Report” or “draft Report”).
2. **ecta** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. **ecta** represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in fixed, mobile and fixed wireless access networks that qualify as Very High Capacity Networks and who demonstrate unique innovation capabilities.

2. Key ecta considerations

3. **ecta** appreciates and thanks BEREC for preparing this very good draft Fact Finding Report, which gives an accurate and objective overview of where the EU stands in terms of connectivity, network quality, performance and pricing, also compared to other jurisdictions. **ecta** considers that the draft Report clearly demonstrates the fit for purpose nature of the wholesale access regulation in Europe vis-à-vis the international peers considered in the draft Report.
4. **ecta** has positively noted that the findings of BEREC in the draft Report are fully in line with what **ecta** has found by gathering data itself, and included in its 2024 response² to the public consultation on the Commission’s White Paper. In the following paragraphs, **ecta** provides its constructive input by demonstrating the data and facts identified in 2024 by **ecta** which either shows alignment with the draft BEREC Fact Finding Report or indicates additional reports which arrive at the same outcome as the draft Report.

2.1. Connectivity

5. **ecta** considers the draft BEREC Fact Finding Report fully reliable and based on objective and demonstrable data in relation to connectivity in Europe vis-à-vis international peers. This is indeed the view that **ecta** expressed in its response to the public consultation to the Commission’s White Paper submitted on 23 June 2024, as follows: “*The European FTTH deployment rate is higher than that of the*

¹ <https://www.ectaportal.com/about-ecta>

² https://ectaportal.com/images/Press_Releases/ECTA_Considerations_on_Commission_White_Paper_24_June_2024.pdf

United States: FTTP in EU household coverage and in US are respectively 55.6% and 43.9%. Source: Report prepared by Analysys Mason for ETNO, available [here](#). In terms of fibre adoption, the most advanced countries include numerous EU Member States (such as Spain, Sweden, Lithuania, Latvia, Portugal, Finland, Luxembourg, France, Slovenia, Denmark, Estonia, Slovak Republic, Poland, Hungary) and EEA countries (Iceland, Norway). The US, has a higher adoption only with respect to few EU Member States, namely Italy, Czech Republic, Greece, Belgium, Germany, and Austria. Source: mid-2022 data released by the OECD, available [here](#)” and “In terms of fixed access, full fibre networks (FTTP), which are critical for delivering gigabit connectivity, have reached 56 % of households while 5G non stand-alone coverage is already available to 81 % of the EU population”.

Such data as of June 2024, referring to the end of 2023, shows the EU’s performance in concerning connectivity taken together with the draft Report’s updated data, exhibits how the trends regarding deployment of future proof and innovative fixed and wireless networks have been positive and improving in time. Europe continues to have a higher FTTH deployment vis-à-vis the United States, which increased considerably year on year.

As regards 5G coverage, both in terms of 5G non standalone and 5G standalone, major progress has been achieved. In fact, as of end 2024 according to the 5G Observatory³, the EU average 5G household coverage has reached 94%, while the 5G standalone coverage (proxy of 3,4-3,8 GHz band) shows remarkable growth rates: as of end 2024 it scored 68% (up from 51% at end-2023).

6. Finally, when it comes to the comparison with international peers, ecta would like to underline what it already expressed in its response to the Commission’s White Paper “...while believing that it is very difficult to make international comparisons, in order to reply to the comparison made by the White Paper, refers in this response, only to the US and Canada as those are the only international peers that can be considered both as “like-minded”, show similar socio-economic, economic-financial patterns and at the same time the similar diversity patterns when it comes to the geographic and orographic conditions (mountains, lakes, number and intensity of urban areas versus rural areas and population density per specific area) in terms of a continental overview. In fact, Japan and South Korea cannot be considered as comparable peers. They are both much smaller than the EU area, they are both characterized by a population mostly concentrated in cities living in huge apartment blocks (far larger than in Europe) In Japan, fibre is deployed on poles due to the ease of repairing after earthquakes and both Japan and South Korea are national states rather than a Union of different states”.

³ European 5G Observatory: <https://digital-strategy.ec.europa.eu/en/policies/5g-indicators-coverage>

2.2. Pricing

7. **ecta** considers that the draft BEREC Fact Finding Report is based on objective and demonstrable data in relation to pricing, which shows clearly that EU Member States and the EU as a whole, are among the best performers vis-à-vis international peers, in terms of pricing and affordability of electronic communications services provided over both fixed and mobile networks. This finding is fully in line with what **ecta** expressed in its response to the public consultation to the Commission's White Paper submitted on 23 June 2024, on the basis of the benchmarking data gathered by a report commissioned by the European Commission⁴. In fact, the report highlights the following: *"...in terms of affordability and inclusion of broadband offers, the EU scores high: the EU27 has the lowest prices for Triple Play offers among all speed categories compared to Japan, South Korea, the USA, Norway, Iceland, and prices for bundles in all speed baskets are lower in the EU27 than in Japan, the USA, Norway, Iceland. Source: European Commission Study on the Fixed and Mobile BB prices in the EU 2022 April 2024, available [here](#)".*
8. This evidence on pricing, taken together with the evidence on connectivity, shows undeniably that **Europe excels with respect to its global peers when it comes to combining the deployment of gigabit networks, with affordability and inclusion**. In **ecta's** opinion, it is EU electronic communications regulation that has delivered a unique European success story. Promotion of competitive markets, combined with effective ex-ante regulatory measures, are driving investments, positive innovation, and consumer benefits in electronic communications.

2.3. Financial performance

9. **ecta** appreciates that in the draft BEREC Report, when it comes to financial performance, the factual evidence points strongly in the direction of the evidence already highlighted by **ecta** in its response to the public consultation to the Commission's White Paper submitted on 23 June 2024. In fact, as put in that response: *"When it comes to the investments by the biggest telcos in the EU vis-a-vis those made by the biggest telcos in US (a strict oligopolistic market with poor wholesale access regulation), the picture for Europe is positive and not the catastrophe painted by the Commission's WP (and claimed by the biggest incumbents for their lobbying purposes). According to recent academic research⁵ that analysed the investments of the biggest telcos in both sides of the Atlantic (i.e. the capital expenditure in proportion of revenue for major European telcos and US telcos in*

⁴ <https://digital-strategy.ec.europa.eu/en/library/mobile-and-fixed-broadband-prices-europe-2022>

⁵ "Big Telcos Aren't Necessarily Better: A Case Study of EU versus US Market Concentration, March 2023". The Study compares the average investments of biggest telcos in EU with the average investments of biggest telcos in US. Average Europe corresponds to the unweighted average for 6 companies: Vodafone, Telia, Orange, Deutsche Telekom, Telefonica, and Telenor. Average US corresponds to the unweighted average for 4 companies: AT&T, Verizon, Comcast, T-Mobile. Available [here](#).

percentage), US and European average capex stood at the same level in 2012 at around 13% of revenue. In 2021 average European capex rose to 16% of revenue and average US declined to below 12% of revenue. The research shows that major EU telcos' average investment is higher than that of US telcos, confirming that competition drives investments. In fact, the research affirms that initial profitability taken before infrastructure investment is comparable between US and EU telcos. However, the profitability of US telcos after taking into account investments in assets is higher. Lower levels of infrastructure investment in the US explain this extra profitability of US telcos".

10. When it comes to the profitability, **ecta** once again has gathered evidence which is fully aligned with the findings of BEREC's draft report: *"when it comes to the financial performance of the EU telcos vis a vis the US telcos, a recent study by Belgian National Regulatory Authority BIPT⁶ analyses the profitability of a sample of publicly listed telecom operators. The study reveals that profit margins and return on capital (ROC) have remained stable in the European telecom sector over the past decade, with no noticeable gap or decrease. This has not had any negative impact on the investments of the players which have been steadily contributed to the infrastructure deployment, be it FTTH or 5G".*
11. In addition to this, and based on the factual evidence and research, **ecta** notes that many of the alternative operators it represents systematically re-invest proportionally far more of their revenues than the incumbents compared by the studies. In **ecta**'s view, the economic stability of the companies and regulatory measures, rather than a concentration of the market into a few providers, should be the primary instruments to prevent any hostile takeovers by non-European companies.

Incumbent telecom operators often function as annuitants, reaping consistent revenue from their established infrastructure and customer base. In the absence of competitive pressure, these incumbent operators typically exhibit a reluctance to invest in new technologies or innovate, as their primary focus shifts to maximizing profits from existing assets rather than seeking growth or improvements. Reduced competition diminishes the impetus for these companies to enhance services, lower prices, or explore cutting-edge advancements, as the lack of external threats allows them to maintain a status quo that is financially favourable but technologically stagnant. Thus, competitive pressure is essential to drive incumbent telecom operators towards continuous investment and innovation, ensuring the dynamic evolution of the telecommunications sector.

⁶ Available [here](#).

2.4. Telecoms Access regulation

12. ecta cannot agree more with the BEREC draft Report's analysis on the role of telecoms access regulation in Europe in driving competition, investment and end user welfare, be it consumer, be it business or public administration, which takes its root from the pro-competitive environment and market outcome that favors diversity.
13. ecta appreciates the overview provided by BEREC in Annex I, from which it clearly emerges how the different regulatory and institutional approaches provide different market outcomes in terms of operator and service diversity. Competition and operator diversity is, in ecta's opinion, fundamental for Europe's competitiveness in the world. In fact, ecta is convinced that the pro-competitive EU legal framework that has created a free market for electronic communications, where different operators, including ecta members, have made massive investments in network and technology to give EU citizens, businesses and public administrations quality and choice at affordable prices, has been a clear success story. The resulting diversity of market players, whether large or small, is paramount to encourage innovation and investment – required to digitalise the EU's economy. This diversity is essential to ensure that consumers', businesses' and public administrations' needs are met, and must remain a core and inalienable value when considering reforms of the EU legal framework. In other words, diversity in telecoms is essential to guarantee Europe's global competitiveness.

3. Final ecta remarks

14. ecta respectfully suggests the inclusion of additional source material in the final BEREC Fact Finding Report, notably:
 - a) Swedish PTS Report dated 22 April 2025 entitled: Telecommunications operators and yield on investment (could be added to Section 7):
<https://pts.se/contentassets/d04c4237da1b4ad6b239bfc15c70589e/telecommunications-operators-and-yield-on-investment.pdf>
 - b) Netherlands Ministry report dated 24 June 2024 on the financial health of European telecom operators (could be added to Section 7):
<https://www.government.nl/documents/2024/06/24/the-financial-health-of-the-european-telecoms-operators>
 - c) OECD broadband statistics, last updated 10 July 2025, showing the strong performance of many EU Member States and EEA countries applying the EU

regulatory framework, certainly by comparison with the USA and Canada (could be added to Section 8):

<https://www.oecd.org/en/topics/broadband-statistics.html>

15. In light of the considerations and additional supportive elements provided by ecta in this response, ecta kindly requests BEREC to confirm the draft Report without material changes, and thanks BEREC for preparing a strong and evidence-based draft Report.
16. In case other stakeholders come forward with elements challenging the draft BEREC Fact Finding Report, ecta asks BEREC to provide stakeholders with an opportunity to discuss and rebut positions, and provide an explicit opportunity for written reply-comments to responses received by BEREC, through an additional consultation of 2 weeks' duration.

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In case of questions or requests for clarification regarding this contribution, BEREC is welcome to contact Mr Luc Hindryckx, ecta Director General.