

To
BEREC

Milan, April 20, 2026
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Strictly Confidential

Subject: Fastweb's contribution to the public consultation on the draft BEREC Report on Virtual Worlds and Web 4.0

Executive Summary

Fastweb welcomes the BEREC initiative to analyze the impact of Artificial Intelligence, Virtual Worlds (VW) and Web 4.0 on the electronic communications sector

As the digital landscape shifts towards immersive, persistent, and decentralized environments, the role of telecommunications operators must evolve from simple connectivity providers to orchestrators of "3C" resources (Communication, Computing, and Caching)

This contribution focuses on four pillars:

1. Chapters 4 and 5 -

The consultation document highlights that enabling VW/Web 4 will require significant investments in VHCN, 5G/6G, edge and cloud networks. Telecommunications operators have been engaged for years in massive investments, including in edge and cloud, in order to enhance their networks taking into account, especially, the traffic levels reached.

The report correctly represents how CAPs and hyperscalers operate as complex conglomerate ecosystems. The holding of strategic assets (data centers, edge nodes and large user bases) creates a real risk of absolute dominance especially if there is simultaneous control of hardware (e.g. VR/AR headsets), operating systems and content platforms. Hyperscalers and CAPs can in fact implement self-preference practices by favoring their own services to the detriment of those of third parties.

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3. Paragraph 5.4 – Spectrum

The draft Report, in paragraph 5.4, provides that some VW/Web 4-related applications, in particular industrial digital twins or other enterprise use cases, may be deployed over local or private network and that some countries have already introduced local 5G licensing frameworks that allow verticals to deploy their own networks in limited geographic areas.

4. Chapter 4 – Incentivizing Edge Computing and Local Digital Infrastructure

The Draft Report acknowledges the ambition of the EU's Digital Decade to deploy 10,000 edge nodes by 2030. However, current progress is insufficient.

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2. Paragraph 5.2 - Specialised services

The draft Report, in paragraph 5.2, acknowledges that the main tool to safeguard network-level openness in VW/Web 4 scenarios is Regulation (EU) 2015/2120 on the Open Internet (OIR), which in particular ensures non-discriminatory traffic management and, in view of its neutrality, can also apply to connectivity solutions and evolving business models, including those connected to VW/Web 4.

However Virtual Worlds are not "traditional" internet services; they are highly sensitive to jitter, latency, and packet loss. As BEREC notes, haptic communications and high-fidelity digital twins may require latencies as low as 1ms. These requirements cannot always be met by the Best Effort "standard" Internet Access Service (IAS) without compromising the experience of other users.

In effect the consultation document also acknowledges that certain services related to VW/Web 4, e.g. those requiring certain QoS, could fall under specialised services under Article 3(5) OIR, leaving open the possibility to assess, in the light of market experience.

In this regard,

Providing greater legal certainty and regulatory predictability in this area is essential to design and implementation of projects and to ensuring the return on the investments required to develop such next-generation network infrastructure.

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Fastweb calls for regulatory frameworks that:

- Promote Technological Neutrality:

- Incentivize Local Infrastructure:

- Address the Investment

5. Conclusions and Recommendations

The transition to Virtual Worlds and Web 4.0 is not merely an incremental update but a structural shift in how digital services are delivered.

To ensure that Europe remains competitive and sovereign in this new era, Fastweb recommends that BEREC's final Report:

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