

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
- ☐ Finnish
- ☐ French
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- ☐ Slovenian
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- ☐ Swedish

* 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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Mynet supports BEREC's aim of providing an evidence-based comparison between the EU and other jurisdictions. This is especially important when parts of the policy debate still tend to presume, without sufficient proof, that the European telecommunications sector is structurally weak because there is too much competition and too little consolidation.

International benchmarking is meaningful only if institutional, geographic and market differences between jurisdictions remain clearly visible. The United States, China, Japan, South Korea, Australia and the United Kingdom operate under very different regulatory and industrial models. Their experiences should not be used selectively to justify regulatory shortcuts in Europe.

Mynet therefore suggests that Chapter 1 state more clearly that the European framework has delivered a distinctive balance between investment, affordability, service diversity and end-user protection. This balance relies on ex-ante regulation, wholesale access, competition among different categories of operators and a plural market structure. These features should not be treated as legacy constraints, but as fundamental European assets.

In particular, the report should avoid any implicit interpretation that treats the presence of many operators as 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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Mynet welcomes BEREC's finding that the EU has achieved substantial progress in both FTTP and 5G coverage, and that European performance is broadly aligned with several global peers. The report correctly notes that coverage and take-up differ significantly across Member States and that penetration is influenced by demand-side, structural and market-specific factors.

Mynet suggests, however, that BEREC supplement household-based FTTP coverage indicators with indicators that capture actual serviceability and operational availability. A household or business may be nominally passed by fibre while still facing long provisioning times, operational faults, inadequate wholesale processes or limited upgrade options. This is particularly important for alternative operators depending on wholesale inputs and for SMEs that need reliable connectivity, not only nominal availability.

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

Mynet also recommends that BEREC draw a clearer line between nominal coverage and actually usable capacity. Access infrastructure is only one element of the picture. Backhaul capacity, redundancy, concentration at local points of presence, peering and transport architecture all shape the real quality of the service delivered to end users. Analysis of penetration and coverage should therefore not be separated from the technical conditions under which services are activated and maintained in practice.

Finally, while FTTP is rightly at the centre of the analysis, Europe should not overlook fibre-backed fixed wireless access and other local connectivity solutions in specific territorial situations. These solutions may be essential where immediate FTTP deployment is economically or physically difficult, provided they are designed 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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Mynet strongly supports BEREC's conclusion that the EU provides highly competitive value for money in both fixed and mobile broadband services. The report confirms that European consumers often benefit from markedly lower prices than consumers in other major jurisdictions, while also receiving improving coverage and competitive quality indicators.

At the same time, Mynet suggests that quality assessment should extend 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 actual level of network contention.

A key 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 through a well-dimensioned local network with adequate backhaul and low contention. The market should therefore move toward greater transparency on the technical conditions underlying the service, not only on the advertised access technology.

Medium-sized territorial operators often use 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 acknowledged 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.

Mynet therefore recommends that BEREC encourage more transparent quality indicators for fixed broadband offers, including, where relevant, disclosure of the underlying access architecture, the dimensioning of backhauling and contention-related parameters in a form that users can understand and compare. 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 that invest 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 merely 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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Mynet welcomes BEREC's analysis of the urban-rural divide and agrees that national averages can conceal significant 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.

Mynet 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, Mynet believes that Europe should also encourage a more open approach to private 5G and local wireless networks. If private 5G remains effectively controlled only by mobile network operators, it risks staying expensive, limited in deployment and poorly tailored to many local industrial and agricultural use cases. Private 5G should be available, under a harmonised European framework, also to fixed operators using wholesale inputs, system integrators, industrial users, agricultural operators and local network specialists.

A harmonised European framework for licence-exempt or light-licensed spectrum suitable for local private 5G would strongly support the effective 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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Mynet strongly supports BEREC's recognition of the EU ex-ante access framework as a tool that promotes both competition and investment. Access regulation is not a barrier to investment. In many Member States, it is the mechanism that enables alternative operators to enter the market, climb the investment ladder, develop their own infrastructure and serve customers who would otherwise have fewer choices.

Mynet suggests that BEREC give greater emphasis to the distinction between formal wholesale access and effective wholesale access. The mere existence of a reference offer is not enough. 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 especially 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 formally while failing in practice. Mynet 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 evaluated 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 delivered 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 greater infrastructure plurality, greater 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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Mynet fully agrees with BEREC that consolidation should not be considered 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 may be useful in certain 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.

Mynet 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 withdrawing 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.

Mynet asks BEREC to state explicitly 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, provide competitive pressure, and 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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Mynet welcomes BEREC's finding that the available financial evidence does not justify a weakening of regulation or merger control. The report correctly observes that European operators generally show stable margins, improving cash flow prospects, returns above the cost of capital in many cases, and a capex cycle that has already peaked in several markets.

Mynet suggests, however, that financial indicators 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 serve as a proxy for the whole sector.

In particular, the financial difficulties of some large operators should not automatically be 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 from financial markets. Public policy should not compensate for these choices by reducing competition or weakening wholesale obligations.

Mynet also recommends that BEREC give greater weight to 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 mainly designed to support consolidation or shareholder returns. Regulation should reward efficient, real, territorial investment, not market power.

For Mynet, the conclusion is clear: there is no financial basis for a bonfire of regulation, for the relaxation of merger control, 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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Mynet supports the main conclusion of the draft report: competition and the regulatory framework that enables 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.

Mynet 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 enabled 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.

Mynet believes that the correct policy priorities are different: effective and enforceable access regulation, transparent quality indicators, access to passive infrastructure, removal of practical deployment barriers, 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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Mynet welcomes Annex I and the effort to compare service diversity across jurisdictions. This is an important part of the report because service diversity is one of the clearest outcomes of the European regulatory model.

Mynet suggests, however, that service diversity should not be assessed only by counting nationwide offers or by looking at mobile market shares. In countries such as Italy, regional and medium-sized operators make 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 provider categories: 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 perform different functions and have different effects on competition and investment.

Mynet 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 all 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.

Mynet 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.

Please upload your file(s), if any:

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Thank you for your participation in this public consultation!

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