FROM MOBILE TELEPHONY
TO INTERNET OF THINGS

BoR PC10 (18) 05

Transatel Response

to the Public Consultation by BEREC on Internet of Things Indicators

BoR (18) 230

23 January 2019

Contents

About Transatel

As the leading European MVNE/A (Mobile Virtual Network Enabler/Aggregator), Transatel has, since its inception in 2000, launched over 170 MVNOs (Mobile Virtual Network Operators) and built a strong expertise in Machine-to-Machine connectivity. Since 2014 the company has offered an unparalleled cellular solution for global, multi-local data connectivity with eSIM capabilities for the IoT market, addressing the connected car, connected objects, and embedded connectivity markets.

Introduction

- Transatel welcomes this consultation in a sense it addresses a decisive matter of electronic communications and related markets.
- Transatel shares the BEREC opinion on monitoring the development of the IoT business. A harmonized frame for such task is deeply relevant and can lead to a satisfying statistical overview of the connected things markets across the European Union.

Transatel Contact Details

Should you need any clarifications on the elements developed in this document, please contact:

Legal Department, Transatel

legal@transatel.com

Responses to the questions

Q2.1: Do you agree with the multi-layered approach in Figure 2 above, which seeks to separate M2M/IoT from the underlying connectivity and shows the relationship to ECS?

In the study of the IoT market, BEREC should distinguish different kind of connectivity on the cellular network: 3G, LTE/4G, LTE-M, NB.

Also, it is important to know who will provide such connectivity, IoT MVNOs or MNOs.

It will be interesting for MNOs to know if the ones will provide connectivity on their footprint (or outside of their footprint) through permanent roaming.

BEREC should care as well to what extent MNOs are bound by bilateral agreements to exclude MVNOs from the market.

Q2.2: What is your opinion on the differentiation of IoT and M2M? Do you have additional proposals regarding such differentiation?

Q2.3: In relation to application solutions, do you see the three categories "Industrial", "Automotive" and "Consumer" as the most relevant? Would you suggest other categories? If so, please elaborate.

Answer to both questions.

According to our point of view, M2M is included into the IoT's definition. Transatel has divided the IoT market into four segments:

- Consumer devices (such as laptops, tablets or trackers)
- Automotive
- Industrial IoT (will be further segmented: Industry 4.0, Transport and Logistics, Utilities and Energy …)
- Mobile Healthcare devices

The Mobile Healthcare devices segment is not developed, yet, in a significant way, which is due to the lack of European harmonized regulation. This status holds back Pan-European solutions for this specific market.

Q3.1: In your opinion, what effects on spectrum policy is the development of IoT expected to have, and do you think it's necessary for NRAs to monitor, and BEREC to benchmark, these developments?

Transatel strongly believes "freedom to innovate" is key to the development of this market. To do so, IoT MVNOs must play a significant role in this expansion, along with MNOs. The harmonization of the regulation across Europe regarding access to the infrastructures" must be completed to enable IoT MVNOs to have a Pan-European development and have the same conditions of network access in Europe.

For instance, Germany is still the most difficult market (but the biggest European market) to deploy IoT solutions with the three MNOs (Vodafone, Telefonica, Deutsch Telekom) locking down the market. Our position is if innovation is only accessible for the MNOs, Europe will suffer a great loss regarding the worldwide-IoT-market.

Q3.2: With regard to the expected growth in the use of IoT devices, do you see the necessity for NRAs to monitor, and BEREC to benchmark, these developments, particularly with respect to numbering? If so, why?

To follow up with the development of the question 3.1, NRAs must ensure that IoT MVNOs can have network access across Europe. Today, the diversity of regulations through Europe is an issue. In one hand, for example, in France the NRA (ARCEP) has given incentives to MNOs to host MVNOs on their networks. On the other hand, the German NRA (BNetzA) is reluctant in encouraging MNOs to give access to MVNOs. This means the IoT MVNOs cannot have an effective Pan-European coverage which limits by itself competition and innovation.

Therefore, we encourage BEREC to be more specific when it comes to network access regulation. There is no need to monitor numbering unless it has the purpose of preventing unethical use of such numbers.

Q3.3 Do you see the need for NRAs to monitor which national numbers for IoT devices are used outside their domestic market/territory (and vice-versa, which numbers assigned in other countries are used in the NRA's territory)? If so, please elaborate.

Transatel thinks IoT players should be free to use either national or international mobile number resources and potentially, one day, European mobile number resources.

Q4.1: What is your opinion on the benefit of a BEREC common approach regarding the IoT?

The IoT market is a worldwide market. Any European player must consider Europe as their domestic market. In fact, independently, each country of the European Union is too small to be seen as a domestic market.

Therefore, BEREC must ensure the reality of an European Digital Single Market, especially when it comes the issue of access for IoT MVNOs.

Q4.2: Do you agree with the general areas of interest for future indicators (to be collected), presented in Figure 4 above? Could you suggest any specific IoT indicators that BEREC should consider for collection?

BEREC should have statistics regarding the number of lines used by MNOs and IoT MVNOs in Europe. Especially, BEREC should focus on what part of the traffic falls into the category of "permanent roaming" and by which operator it is provided. These figures will help to show if some MNOs in Europe have bilateral agreements on permanent roaming, which is, with no doubt, detrimental for the competition.

Q4.3: Do you support the gathering of statistical information on IoT by BEREC? Please substantiate your answer.

Transatel supports this initiative. This data should be displayed by category of players (MVNOs/MNOs), on the model of the ARCEP trimestral report (known as SIM – Suivi des Indicateurs Mobiles). This report should present the number of lines that are used on a "permanent roaming" basis.

Jacques BONIFAY
Transatel CEO