

To the attention of:  
**Mr. Roberto Viola**  
[Roberto.Viola@ec.europa.eu](mailto:Roberto.Viola@ec.europa.eu)

Stockholm, 22 April 2020

**Subject: BEREC response to EC recommendation on Covid-19 tracing apps**

Dear Mr Viola,

BEREC notes the European Commission Recommendation of 8.4.2020 on a common Union toolbox for the use of technology and data to combat and exit from the COVID-19 crisis, in particular concerning mobile applications and the use of anonymised mobility data. We also appreciate that the document 'Mobile applications to support contact tracing in the EU's fight against COVID-19, Common EU Toolbox for Member States' was developed by the eHealth Network and published on 16 April 2020.

While the main body responsible for implementing the Recommendation is the eHealth Network, BEREC is identified as an organisation from whom as appropriate Member States should seek input when implementing the Recommendation.

Several BEREC members are advising their Governments at national level concerning development and application of such apps. Several BEREC members are also liaising with their Data Protection Authorities at national level concerning development and application of contract tracing apps.

BEREC would like to offer its expertise of the electronic communications market and would be pleased to assist the eHealth Network in implementing the Recommendation. BEREC is able to contribute to the activity of the eHealth Network, through its relationship with the ICT sector, in particular with operators. The core competences of BEREC are especially in the following areas:

- Electronic communications sector regulation, in particular the implications on existing ex ante regulation;
- ePrivacy, open Internet;
- advice on technical capabilities of mobile networks and handsets,
- cross-border interoperability;
- advice on technical interoperability issues for the use of Android and iOS in the context of location data.

BEREC also would like to note that cooperation with ENISA on data security issues would be essential. Furthermore, it is vital that any action taken based on the Recommendation would respect existing privacy regulations and that emergency measures do not remain in use once the crisis is over.

BEREC would welcome a continued dialogue with the European Commission on how to best provide its support in this initiative.

Yours Sincerely,

(e-signed)

**Dan Sjöblom**  
BEREC Chair 2020