

**BEREC Opinion on the national  
implementation and functioning of the general  
authorisation, and on their impact on the  
functioning of the internal market, pursuant to  
article 122, paragraph 3 EECC**

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## Introduction

Pursuant to Article 122, paragraph 3 of Directive 2018/1972 establishing the European Electronic Communications Code (hereinafter: EECC), BEREC is due to release, by 21 December 2021 and every three years thereafter, an Opinion on the national implementation and functioning of the General Authorisation (hereinafter: also GA), and on their impact on the functioning of the internal market.

Taking utmost account of such Opinion, the Commission may publish a report on the application of the GA-related provisions in the EECC and may also table legislative proposals to amend them, should it hold it necessary in order to address any obstacles to the proper functioning of the single market.

To comply with such task, BEREC has taken stock of the transposition and implementation solutions adopted by Member States to date regarding the GA-related provisions, as last reviewed by the EECC (articles 12-19 EECC).

Furthermore, BEREC held it appropriate to collect views from interested stakeholders by launching a call for input on the subject, which ran over the summer 2021 and identified some relevant matters with reference to the actual operation of the GA scheme and the potential solutions ahead.

The BEREC Opinion intends to snap a picture of the current functioning of the GA regime in the Union, in view of elaborating on the impact of the GA regime on the single market, as requested by article 122.

At the moment of writing the present Opinion, 11 Member States have transposed the EECC into national legislation.

As a consequence, the present Opinion develops some reflections around the operation of the GA, any related issues emerged so far and possible forward looking regulatory reflections, although a fully-fledged analysis building on all the specific Member States' decisions and on a subsequently consolidated experience by market players in this respect could be completed at a later stage, once transposition is finalised throughout the Union.

## I. The legislative background

General authorisation represents a cornerstone of the EU electronic communications legislation; starting with Directive 96/19/EC, eliminating all special and exclusive rights for accessing the electronic communications markets, the GA scheme started consolidating with Directive 97/13/EC, laying down a common authorisation-related framework where national recourse to discretionary administrative proceedings for market entry (the old licensing system) was constrained, with a view to reducing costs borne by operators and to achieving the single market.

General authorisation qualifies as a general legal framework laying down rights and obligations for all networks and services, excluding any explicit decision by the public authority as a requirement for the undertakings to start providing networks and/or services; it consists

of a set of predefined conditions not applying to individual cases, thus warranting an equal treatment of all players.

Directive 2002/20/EC, replacing Directive 97/13/EC, fully recognised the freedom to provide networks and services in the EU and set the GA scheme as the only regime for market entry in the electronic communications sector; since then, undertakings in the EU can start providing networks and/or services upon notification of their intention to start to the competent authority (in the Member States where such notification is envisaged). Such a notification constitutes indeed the maximum requirement that can be imposed on operators to enter the market. Only in case of application for scarce resources (radio-spectrum and numbering), an additional layer is envisaged for the release of relevant rights of use (according to articles 5, 6 and 7 of the mentioned Directive).

Pursuant to article 3 of Directive 2002/20/EC, the operator's notification of the beginning of the activity should not have entailed "*more than a declaration by a legal or natural person to the national regulatory authority of the intention to commence the provision of electronic communication networks or services and the submission of the minimal information which is required to allow the national regulatory authority to keep a register or list of providers of electronic communications networks and services.*"

Nevertheless, this article provided only a non-exhaustive list of information that may be included in national notification forms, which resulted in Member States exerting their room of manoeuvre when transposing and implementing the obligation and in a range of notification forms varying from Country to Country in terms of information overall requested from sector operators.

Directive 2018/1972 establishing the European Electronic Communications Code, further strengthened the GA system, confirming the notification as the maximum requirement potentially put on operators in relation to market entry.

In addition, pursuant to article 12, paragraph 4 EECC, the list of information that can be covered by national notification forms was turned into an exhaustive one, thus limiting Member States' flexibility in defining the amount of information to collect.

In order to further simplify national notification-related fulfilments with a view to the single market, the same provision required BEREC to "*publish guidelines for the notification template*", i.e., guidelines outlining the main features and contents of the notification form – within the constraints provided for by article 12, paragraph 4 – to be used by Member States opting for a notification requirement, and to set up a Union database of the notifications transmitted to the competent authorities by providers falling under the general authorisation regime and subject to the notification requirement.

BEREC adopted the Guidelines on the notification template in December 2019<sup>1</sup> and set up, by December 2020, the mentioned database, which is currently being populated by NRAs and Other national competent authorities (OCAs).

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<sup>1</sup> [BoR \(19\) 259](#) BEREC Guidelines for the notification template pursuant to Article 12, paragraph 4 of Directive 2018/1972 of the European Parliament and of the Council.

The General Authorisation regime does not only cover market access-related requirements, but it implies a whole set of rights and obligations on undertakings, that are recalled in article 13 and 15 and then fully outlined in Annex I to the EECC. This latter provides for the maximum list of conditions that may be attached to General Authorisation and includes, *inter alia*, conditions relating to administrative charges, privacy protection and legal interception-related obligations, as well as interconnection and interoperability duties.

## II. Scope of the Opinion

In the light of Article 122.3 EECC, the BEREC Opinion scope is twofold: it shall cover both i) an analysis of the national implementation choices concerning the GA regime as last reviewed by the 2018 EECC, and ii) an assessment of its overall operational functioning and effectiveness in practice, particularly with a view to the single market goal.

As concerns the first subject, only a preliminary overview and analysis of national implementation choices can be made, as not all EU Member States have concluded the EECC national transposition; given such unaccomplished process, BEREC cannot benchmark all the national implementation solutions of Article 12-19 EECC. Nevertheless, BEREC is hereby providing a snapshot of national implementation trends in this respect.

BEREC is furthermore called, pursuant to Article 122, paragraph 3, to come up with an evaluation of the whole GA scheme as to its effectiveness in sustaining the achievement of the single market, also in the light of the latest developments in the digital ecosystem and the relevant potential regulatory aftermaths. Considering that the BEREC Opinion is due to inform the wider Commission's review of the GA system, the aim of the present Opinion is to provide a comprehensive analysis of the functioning of the GA so far, including in terms of its prospective capacity to function and foster the achievement of the sectoral objectives in the context of fast evolving digital markets.

The present BEREC Opinion is structured as follows:

Chapter 1 gives a brief account of the current state of the national transposition processes with specific reference to article 12 EECC - laying out the conditions for market entry under the GA regime - and the relevant choices that are being made by Member States in this respect.

Chapter 2 provides an overview of the main outcomes of the call for input, mainly focused on the overall functioning of the GA regime, on a possible extension of the current scope of the GA framework and on the implementation and functioning of the European database for notifications of General Authorisation (hereinafter: GADB), as well as on some considerations around input received.

Chapter 3 is devoted to providing a BEREC assessment of the general authorisation regime and possible suggestions to the European Commission for its improvement, in order to better achieve the regulatory goal of the proper functioning of the internal market.

## 1. The current transposition status

11 EU Member States have finalized the EECC transposition (AT, BG, CZ, DE, DK, EL, FI, FR, HU, IT<sup>2</sup> and MT), 16 are in the process of completing it (BE, CY, EE, ES, HR, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI, SK).

By and large, according to information available, the notification duty, envisaged as the maximum requirement according to article 12 EECC, is being confirmed by all Member States, with the only exception of FR which has lifted it<sup>3</sup>. DK and FR are therefore the only EU Member States currently not envisaging a notification obligation for operators to enter the electronic communications markets.

7 MS (AT, CZ, DE, FI, IE, MT, and NL) clarified that the notification duty does not apply/is not intended to be applied to NIICS providers. ES informed that, according to the preliminary draft transposition law, NIICS providers shall be subject to a communication duty though, different of a notification one.

In most of the surveyed MS, the notification forms have not been updated yet, pending the EECC transposition. However, most contributing NRAs reported about ongoing activities for reviewing the current national notification forms.

Several NRAs confirmed that the BEREC template is being/has already been taken into account (AT, BE, BG, CY, CZ, DE, EL<sup>4</sup>, FI, HR, HU, IE, IT, MT, PL, PT, SK). In HR, pending the EECC transposition, the current notification requirements have already been adjusted, based on article 12 EECC (which has been considered as a directly applicable provision) and the national notification form has been aligned to the BEREC template, with the relevant information requested being considered as exhaustive. In NL instead there are currently no plans to use the BEREC template.

Specific national adaptations of the BEREC template are envisioned in some Countries. In PT further contact information (for consumer protection purposes) and a different list of networks and services (then adapted to the BEREC template with a view to be sent out to the Union Database) are envisaged, whereas the short description is organized via checkboxes; such national specificities are mainly explained by the need to articulate notification data with the data later collected for statistical as well as regulatory purposes, including classification under the national numbering and the national frequency allocation plans. In BE the information will be collected on whether the notified activities are operated on a profit basis (in view of defining the fees due accordingly). In BG the main challenge being encountered in defining the new national notification form consists of complying with the BEREC's list of networks and services, although the notification form currently in use is reported to be in line with article 12 EECC already.

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<sup>2</sup> Legislative decree 8 November 2021, n. 207 transposing the EECC in the Italian legal order was published on the Official Journal of the Italian Republic on 9 December 2021.

<sup>3</sup> According to article 50 of decree n. 2021-650 of May the 26<sup>th</sup> 2021.

<sup>4</sup> The BEREC template has been widely adopted. For some services, a different categorization from the one of the BEREC template is included. However, the mapping with the BEREC template's categories is feasible.

## 2. The stakeholders' views

In this chapter, aspects are outlined that were raised within the call for input by some stakeholders, based on their own experience of the GA scheme, as it was designed by the EU co-legislators so far.

BEREC has already been looking into the operational challenges encountered by stakeholders in the GA field by means of a specific investigation back in 2011<sup>5</sup> and has subsequently kept on analyzing these issues within the broader scope of EU legislative processes covering GA-related matters (both the Telecom Single Market and the EECC proposals).

The operational challenges outlined in the following paragraphs, already identified by BEREC in the mentioned contexts, relate to EU sector legislation in force before the latest sector legislative review and constitute aspects addressed right in the EECC.

In this respect, while conveying the idea that the GA system has been properly working in ensuring a smooth market entry in individual Member States to date, high expectations have been expressed by market players on the simplifying capacity of the newly introduced provisions.

### 2.1. Functioning of the GA scheme in the stakeholders' views

The stakeholders pointed to some matters concerning the functioning of the GA system in practice, which impact on a smooth market entry and, in a European perspective, an effective operation of the Single Market; such matters regard GA-related requirements stemming from electronic communications legislation, as well as the whole set of fulfillments bearing down on operators when entering electronic communication markets.

In this respect, the GA scheme, as introduced back in 2002, then reviewed in 2009 and confirmed by the EECC in 2018, was reported to work well in individual Member States as a conceptually leading system presiding over market entry and it was considered to have significantly harmonized maximum requirements, therefore lowering obstacles to market entry.

A few concerns have emerged in terms of consistency in its implementation throughout the Union, especially for electronic communications providers acting at a cross-border level.

The issues brought forward mainly focus on two areas, namely:

- i) problems concerning the specific national implementation choices in transposing the EU electronic communications legislative framework, and;

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<sup>5</sup> See the "BEREC report on the impact of administrative requirements on the provisions of transnational business electronic communications services" – BoR (11) 56 of December 2011.

- ii) problems stemming from other features of the national legal orders at stake, involving either constitutional, criminal, or administrative law provisions.

### **2.1.1. Problems rooted in the electronic communications legislative framework and how it is implemented at national level**

Appreciation was expressed for the GA scheme as it is implemented by the widest majority of EU Member States (i.e., the notification duty, while the no-notification mechanism implemented in very few Member States was welcomed too by some stakeholders).

With reference to Countries where a notification duty is in place, the most prominent problem seems to be represented, especially for operators providing services throughout the Union, by the different features of national notification forms and the different notification processes implemented at national level, which both prevent undertakings from repeating the same notification course in each Member State where they intend to provide their networks and/or services.

Such differences, especially in terms of level of detail of the national notification forms (some requiring detailed descriptions of networks and services, with relevant specific categorizations, some being very high-level) have been already identified in previous BEREC investigations<sup>5</sup> and derive from the grounds of flexibility that Member States hold when transposing the relevant *acquis*, which has translated so far into some variations in the overall amount of information collected from operators.

While it is understood that such national variations do not allow global players to run a totally identical notification process in every Member State where they intend to be operational, it holds also true that some national differences are possible in principle, as Member States can legitimately transpose the GA-related provisions in the EU legal framework with some adaptations, within the boundaries set out by the framework itself, thus resulting into different procedures in different Member States.

In this respect, the EECC is expected to further simplify and standardize the information that competent authorities are allowed to collect from market players.

The exhaustive list of information as in Article 12 EECC, together with the notification template adopted by BEREC in 2019 are expected indeed to streamline the notification process throughout the Union, bringing notification forms progressively in line, at least as concerns data that competent authorities gather pursuant to the electronic communications' regulatory framework.

Still in relation to the functioning of the GA regime in different Member States, the stakeholders reported different interpretations of the notification requirement in different Member States: in some cases, this duty is reported to apply to any single change in the scope of the operators' activities; in other cases, information on the new networks/services that an operator might want to supply is said to be collected instead via the regular reporting obligations bearing down on authorized operators.



Other issues were mentioned in relation to GA within the stakeholders' contributions:

One issue relates to the envisaged reporting obligations on authorised undertakings: they were mentioned to be much differentiated, with burdensome and *ad hoc* requests in certain Member States sometimes not appropriately addressed, according to some stakeholders, to B2B operators<sup>6</sup>.

The stakeholders also reported different levels of administrative fees<sup>7</sup> as well as of sanctions and suggested further harmonization in this respect.

All these matters are reported to negatively impact on operators, acting as barriers to market entry as well as to the smooth functioning of the single market, since operators may be disincentivized to operate in determined Member States.

These are areas covered by the electronic communications framework, that can already be addressed by monitoring and enforcing the application of EU rules at national level: in other words, either there are specific national misalignments with the relevant EU law that the European Commission might detect and intervene on, or the specific national situations might be legitimately stemming from the mentioned flexibility allowed to Member States in designing national implementation solutions, especially where the relevant *acquis* is not very detailed (e.g., on periodicity and extent of the reporting obligations on which both Article 11 of the Authorization Directive and Article 20 of the EECC provide NRAs, other competent authorities and BEREC with discretion). In this latter case, Member States have wide flexibility (e.g. on sanctions that shall comply with the principles as in Article 29 EECC, under the control of the Court of justice<sup>8</sup>).

All in all, the EECC addresses most of the above-outlined issues by means of criteria shaping and constraining the relevant Member States' choices; hence, the national differences that might be arising, if justified on the basis of such criteria, shall be legitimate.

On the above matters, without prejudice to the Commission's power to verify Member States' compliance with EU Law, BEREC will be in a position to develop a thorough assessment in terms of the EECC effectiveness, only after its member NRAs and OCAs will have acquired a longer experience with the EECC implementation.

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<sup>6</sup> The reference here is to information collection targeted to providers serving consumer users, that are carried out also with reference to undertakings serving the business segment.

<sup>7</sup> On the topic, back in 2011, stakeholders raised the issue of an inconsistent way of calculating administrative fees in different Member States: in some cases, they were reported to be based on total electronic communication service revenues, in other cases a "net revenue" or "valued added" approach was mentioned to be applied. Since such fees' calculation criteria are detailed in the sectoral *acquis* (art. 16 EECC), either such complaints point to potential misalignments of national legislation and practice with the relevant EU Law, or they refer to legitimate national differences, based on different underlying administrative costs borne by NRAs.

<sup>8</sup> The level of sanctions, falling outside the specific GA topic, is not harmonised across the EU. The penalties should be appropriate, effective, proportionate and dissuasive, pursuant to Article 29 EECC.

### **2.1.2. Problems laying outside the electronic communications legislative framework impacting on the operators' market entry experience**

According to the outcomes of the call for input, several issues influencing the operators' experience with market entry stem from outside the EU electronic communications regulatory framework and its national implementation patterns.

Information stemming from pieces of EU or national legislation different of the electronic communications networks and services framework (hereinafter: ECNS framework) that NRAs/OCAs may be collecting in the context of notification impact indeed on the actual operators' experience of the overall fulfillments related to market entry, despite being unrelated to GA. Although not falling within its own remit, it is worth for BEREC to take stock of aspects enlisted by the stakeholders, for any follow-up consideration.

Most operators taking part in the call for input reported about the following administrative requirements making the notification duty cumbersome to comply with:

- notification language: in some cases, the notification can only be submitted in national language;
- materials to be attached to the notification form: some Member States require a lot of documentation to be attached, often in national language only and with relevant certification/authentication;
- undertakings' identifiers: in some cases, Member States require the notifying undertaking to be registered with national authorities exclusively and to produce the relevant identification/VAT numbers or have a national digital account;
- contact person: in some cases, Member States require a legal representative to be available in the Country and enabled to submit notifications.

As stated, all the above aspects stem from pieces of national law different of the electronic communications framework (e.g., constitutional, administrative and criminal law constraints) and are distinct of the notification requirement.

## **2.2. Some forward-looking considerations**

In addition to the operational aspects of the GA regime, a general request was flagged to reflect on the scope of the GA framework.

Several stakeholders put forward the proposal to expand it at least to Number Independent Interpersonal Communications Services providers (hereinafter: NIICS), if not horizontally to all digital players throughout the value chain, for the sake of ensuring a level playing field, and in the light of recent EU legislative initiatives going in this direction.

The rationale for such requested expansion of the GA regime and the attached conditions is based on different reasons, ranging from the need of guaranteeing an efficient market monitoring by NRAs, to that of effectively implement the consumer protection provisions that apply also to NIICS providers, of warranting long-term fair competition as well as a level-

playing field, in the light of the progressive substitution of traditional voice call services with OTT services.

In view of designing the appropriate perimeter for the future sector regulatory framework, BEREC has already been looking into the highly debated topic of the suitable scope of the ECNS framework in fast evolving markets; to this end, it has been working on the concept of substitutability of services<sup>9</sup> and, in the light of the reflections made, believes that there is merit in looking at the prospectively appropriate scope of the GA scheme, with a view to ensuring that NRAs/other competent authorities are endowed with the necessary tools to monitor the markets under their competence and to foster long-term competition. In such respect, it would be worthwhile to first carry out an assessment of the EECC implementation throughout the Union, so as to evaluate to what extent the inclusion of NIICS providers in the scope of the framework, provided for by the EU legislator in 2018, the relevant obligations bearing down on them and the widened NRAs' information collection powers as in Article 20 EECC (applying also to NIICS providers) might be addressing the above-mentioned stakeholders' concerns already.

In order to assess whether the new legislative framework is able to answer the stakeholders' concerns as to the NRAs' capacity to monitor their whole reference market (NBICS and NIICS providers), apply consumer protection provisions to NIICS providers as well as to ensure long-term competition and a level-playing field, it would be indeed of utmost importance to have some on-field experience on the EECC achievements, which would require it to be fully implemented in most EU Member States. To this end, BEREC will closely monitor the application of the new EECC provisions, being aware that, despite the new NRAs' powers granted by the EECC to request information from NIICS providers as well as from players outside the ECNS sector, the swift enforcement of such powers may be hindered in the absence of a contact point designation.

One further issue that was raised for the future concern the lack of clarity in the scope of the categories of networks and services in some Member States' notification form, where limited detail is reported to be provided on their perimeter.

This matter is expected to be addressed, as transposition progresses, through the progressive adherence to the BEREC Guidelines, which serve the purpose of aligning as much as possible national notification forms and harmonizing the relevant notification duty.

### **2.3. The EU Database**

Pursuant to Article 12, paragraph 4 EECC, BEREC was due to set up and maintain an EU database of the notifications that operators submit to national competent authorities. According to the EECC timelines, the database was up and running by December 2020, deadline by which competent authorities shall have started forwarding to it all subsequent

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<sup>9</sup> See BEREC Report on OTT services of January 2016, document BoR (16) 35, where a taxonomy of OTT services is proposed.

notifications. Notifications provided to competent authorities before 21 December 2020 shall be provided to the BEREC database by 21 December 2021.

The database was established on the background of thorough technical reflections on its most efficient design to comply with the EECC goals, considering that it constitutes a repository of national notifications, a complementary tool naturally stemming from the harmonization of notification forms promoted by the EECC (more standardized national forms lend themselves to be put together within a comparable framework in a database) and a means to foster transparency for market players on who is active in different markets.

Due to the delays in national transposition processes, as well as to technical aspects to be dealt with at national level, only few NRAs/other competent authorities have started providing national notifications to the EU database (BG, EL, ES, FI, HR, HU, HR, LT, SK). This is the main reason why some stakeholders still report a limited experience with this tool, which does not provide yet the full overview it is planned to give.

The stakeholders participating in the call for input overall welcomed it as a lean, effective and well-designed transparency tool. Nevertheless, its functioning shall be carefully reviewed at a later stage once, as the transposition is finalized, NRAs/OCAs in all Member States are enabled to fully populate it with national data.

At this point in time, BEREC can only reason around the stakeholders' input as to the possible ways to improve the database interface and functioning. All the suggestions in this respect will be duly considered, especially as concerns the chance of inserting information on the type of GA held by individual operators, further streamlining information covered and, as mentioned by one operator within the call for input, improving the user interface and introducing further elaboration functionalities so to allow wider comparisons for the sake of transparency.

### **3. Conclusions and possible further steps**

Finally BEREC intends to provide some ideas for the Commission to consider for future reflections around the GA scheme, in the light of the challenges reported by the stakeholders and of its own experience, also considering previous investigations into the subject.

While, considering the delays in the EECC transposition in the Union, it is early to thoroughly assess the functioning of the GA scheme as last reviewed by the EU co-legislators, in line with the stakeholders and the NRAs' views, overall satisfaction for its main features to date can be expressed, as well as positive expectations on the capacity of the GA-related provisions in the EECC to further streamline the system.

The difficulties underlined by the stakeholders, already known to BEREC<sup>5</sup> and outlined again in the present Opinion, mostly appear as being addressed by the GA-related EECC provisions - whose effectiveness in further simplifying the system will be tightly monitored by BEREC and checked again at a later point in time – or falling outside the sectoral framework.

A regulatory aspect relevant for further consideration concerns the chance of reconsidering the appropriate scope of the legislative framework, encompassing also NIICS providers in the GA scheme. This theme too shall be thoroughly reconsidered after the EECC transposition is completed, in order to properly assess the reach and effectiveness of the EECC in capturing some of the matters raised.

The GA scheme has been properly working so far in regulating market entry, without creating barriers for operators in entering national markets.

In particular, the GA notification system, chosen by the wide majority of EU Member States, appears as a winning choice as it was reported to guarantee simplicity, together with a clear overview of the markets, hence a good transparency level.

The register of providers, a tool implemented within notification schemes, is indeed considered as an essential regulatory instrument to ensure a level playing field in the exercise of the operators' rights and obligations, for NRAs to monitor the market, enforce the relevant rules and ensure certainty regarding the rules applicable to the providers. The review of the received notifications and the incorporation of the information therein into the register allows indeed NRAs to qualify the services at stake and, therefore, ensure legal certainty as to the provider's rights and obligations. Furthermore, the provision of contact point- related information ensures that NRAs' requests for information reach the relevant undertaking<sup>10</sup>.

All in all, the notification system and the associated register of authorized undertakings appear as essential tools for an effective and coherent application of sector regulation.

Regarding the operational challenges experienced by operators, BEREC sees the merit to get back to take stock of the situation regarding the heterogeneity in national notification forms at a later stage, once the EECC transposition is completed, and national notification forms – in Member States where these will still be envisaged – are adapted to the revised framework, including the BEREC Guidelines<sup>1</sup> bearing a notification template.

Only then, it will be possible to check whether the EECC, together with the BEREC notification template, have triggered the harmonization and the simplification of national notification fulfillments, thus easing the operators' activity to the benefit of the single market. After a check as such, the Commission might evaluate other initiatives to further promote the adherence to the BEREC Guidelines for the notification template. BEREC provides its full availability to monitor any progress in the field of national adherence to such Guidelines.

In other areas where the alleged national heterogeneity concerns the implementation of the ECNS framework, the Commission might decide, once the EECC transposition is completed,

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<sup>10</sup> Requests for information to non-registered entities have proven difficult sometimes and the practical issues regarding requests for information to NIICS, without a contact information point (since they are not subject to the GA regime) shall accordingly be analyzed in the near future.

to verify Member States' compliance with the relevant *acquis*; this might be the case of administrative fees as well as of reporting obligations imposed on operators.

Regarding the most appropriate reach of the GA framework, a reflection shall be carried on the background of the EECC implementation, in order to check whether the EECC provides NRAs/OCAs with sufficient market monitoring, information collection and relevant implementation powers vis à vis the entire range of concerned actors, including NIICS providers.

Areas for further analysis that BEREC intends to go back to after the EECC transposition relate to the obligations stemming from article 12 EECC, including issues around the notifying undertaking's main establishment and contact details and the possibility of requesting non-EU providers a contact point within the EU. Also, the chance and tools to foster the digitization of the notification processes shall be further investigated.