Response to BoR (20) 110

Consultation on

Guide to the BEREC 5G Radar

and

5G Radar

31 July 2020

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I. Introduction

MVNO Europe welcomes the opportunity to provide its brief written input to the consultation on the Guide to the BEREC 5G Radar, and BEREC's associated 1-page interactive PDF file constituting BEREC's 5G Radar – BoR (20) 110.

MVNO Europe appreciates the broad scope of these BEREC documents. They provide a useful overview of points to be addressed to ensure a successful and competitive European 5G ecosystem.

MVNO Europe puts forward a proposed key addition, based on specific considerations detailed hereafter, and requests that international roaming for 5G is brought forward.

II. MVNO Europe Response

BEREC's document contains 23 points, every single point of which MVNO Europe supports in full.

Potential new 5G wholesale markets (points 6 and 8) are addressed by BEREC. Sharing resources among 5G Mobile Network Operators is also covered by BEREC (point 15).

MVNO Europe wishes to comment that BEREC's points appear to essentially address industry-specific wholesale access to 5G networks (services for industry 'verticals', involving differentiated QoS requirements, and network slicing). MVNO Europe agrees that industrial applications are clearly key for 5G.

MVNO Europe represents various companies, including several leaders on specific 5G industry-specific markets (automotive, industrial, etc.). Our member companies active in industrial markets are keenly interested in 5G wholesale access to support future industry-specific use cases.

However, MVNO Europe wants to be very clear in stating that generalised wholesale access to 5G networks is needed, to stimulate innovation and competition for all types of end-users. Generalised wholesale access to 5G networks will enable existing MVNOs, and new entrants, on all types of existing and new markets, to come up with new ideas, for better serving individual consumers, to come up with new business models, and to provide new services that no-one has thought-up before, ultimately benefiting end-users of all types.

Restricting wholesale access to 5G networks to specific industrial sectors, or use cases that BEREC may think are relevant in 2020, underestimates future innovation potential, and may unduly constrain necessary generalised 5G wholesale access, which will be essential to triggering

innovation and competition going forward, to, serve consumers, businesses, public administrations, and others.

Clearly wholesale roaming for 5G also needs to be ensured as a matter of priority (point 16), and needs to be moved forward from 2022 to 2020/21.

Based on the points made above, MVNO Europe asks BEREC to amend its document, adding a point explicitly supporting generalised wholesale access to 5G networks, as a positive signal for competition and innovation, and to ensure effective 5G wholesale roaming. In the 5G radar, separate bubbles for Network Slicing and for Generalised 5G Wholesale Access for MVNOs/MVNEs should be created, to reflect the expectation that these two types of wholesale access will be quite distinct, and may attract different types of users. For instance, Network Slicing may attract industrial 'verticals' directly (i.e. retail use of an MNO's services), as well as some specialised intermediaries whose focus is elsewhere than on connectivity, whereas the Generalised 5G Wholesale Access for MVNOs/MVNEs bubble would attract Full MVNOs/MVNEs and other service providers of broader scope and ambition, providing connectivity and wider service portfolios to multiple types of users, providing competitive alternatives to MNOs' own service propositions.

The best way to prepare for an unknown future is to open-up possibilities for innovators. A more diverse and a more competitive market, at national level within each EU Member State, and on pan-EU scale, will support competition and innovation, resulting in benefits ranging from the individual consumer to users of pan-EU and worldwide IoT.

For further details, please refer to MVNO Europe's responses to BEREC's consultations on 5G Regulation, BEREC's Strategic Priorities, and BEREC's Work Programmes.

III. About MVNO Europe

MVNO Europe represents various types of Mobile Virtual Network Operators (MVNOs), with different business models, addressing consumers, business users (including start-ups/scale-ups)/medium/large businesses, the public sector, ICT service/systems integrators, and Internet of Things (hereafter 'IoT') markets, etc. http://www.mvnoeurope.eu/members

MVNOs currently represent +/- 10% of SIM cards in the European Union.

The term "virtual" refers to the fact that MVNOs do not control radio frequencies and related mobile physical infrastructure (antennas, base stations etc.). However, MVNOs do control the necessary hardware/software/resources to provide wireless/mobile services and may own other telecom infrastructures depending on the extent of their business model.

Our members provide mobile-only offers, fixed-mobile convergent offers and offers incorporating audio-visual media content, financial services, machine-to-machine communications, embedded data SIMs for tablets, laptops and other devices, connected mobility for vehicles, IoT in a broad sense, etc. Some of our members are also active on wholesale markets as MVNE (E=Enabler) / MVNA (A=Aggregator) supporting other companies and brands that provide wireless/mobile services. MVNO Europe does not represent branded resellers.

MVNOs contribute strongly to innovation and competition and provide clear Business to Consumer (B2C) and Business to Business (B2B) end-user benefits.

MVNOs also contribute to financing mobile network infrastructure through payment of wholesale charges which assure revenues to Mobile Network Operators, whilst avoiding costly duplication of network assets.

IV. MVNO Europe Contact Details

Should you require any clarifications or further information on the elements and positions set out by MVNO Europe in this document, please contact:

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