



ETNO / GSMA response to consultation on BEREC draft Report on comparison tools and accreditation

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ETNO and GSMA would like to provide comments to the draft BEREC report on comparison tools and accreditation. In the draft report, we welcome the greater number of transparency comparison tools available across the EU27 to potentially provide citizens clarity and assistance in their choice of service provider of Internet Access Services (IAS) and interpersonal communication services (ICS).

Art. 103 (2) and (3) of the European Electronic Communications Code stipulates the requirements falling on national competent authorities in coordination with national regulatory authorities to ensure that end-users have access to at least one comparison tool and upon request for such a tool to be certified.

In the report, there is a very schematic lining-up of the tools available and the analysis is predominantly quantitative. We find that the draft lacks a qualitative analysis and general critique the tools currently available. Also, according to the Code, the comparison tools should provide an overview equally on Number-based ICS and Number-independent ICS. It is clear from the analysis that available comparison tools mainly focus on NB-ICS with only a few providing or contemplating to provide comparison of NI-ICS.

Other aspects that we find are of importance to all stakeholders is the failure to identify costs and investments made on a country-by-country basis in order to provide the comparison tool. We encourage BEREC to consider the following additional aspects:

- Per capita use of the available tools and to which degree they impact the end-user's buying/switching decision; contribute to customer satisfaction; and/or knowledge of available offers on the market;
- Efficiency of the tools

As a last point, we would like to reiterate a general view expressed by members that providing inputs to the comparison tools is a heavy duty requiring considerable effort, and therefore, it is pertinent to investigate whether it is proportional to require the availability of the comparison tool in the future taking into the account the administrative burden on providers vs end-users' usage.

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