

Sent by email to: copper_switch-off@distro.berec.europa.eu

8 January 2025

Public consultation on the Draft BEREC Report on Managing Copper Network Switch-Off

Dear Sir/Madam,

EENA welcomes the opportunity to take part in the BEREC consultation on its draft Progress Report on Managing Copper Network Switch-off. We propose an amendment to the conclusions on page 26 to note the relevance of the lessons learned from managing this switch off for future switch-offs.

EENA emphasises that the lessons learned from the copper switch off should be considered by NRAs, governments and network operators when implementing future switch off plans, including the ongoing switch off of legacy 2G and 3G networks. In this regard, EENA welcomes the positive practices which were identified as reducing the impact of the copper switch-off on end users.

In particular, EENA notes that effective communications with alternative network operators and end users during the copper switch-off were effective in avoiding active connections being cut. A similar focus on effective communication strategies would be invaluable during future switch offs, to ensure that people who rely on these technologies are aware that their devices will soon lose functionality. This is all the more important for switch offs which have an impact on access to emergency communications, such as the upcoming switch off of the 2G and 3G networks, which are regularly used for emergency communications, including by users of older handsets, security alarms or health devices, and owners of vehicles using legacy eCall.

EENA would therefore be grateful if the BEREC report considered how the lessons learned from the copper network switch off could be applied in the future. With this in mind, we would like to add the following text to the end of paragraph 9 of the conclusion:

"BEREC also notes that the lessons learned in ensuring sufficient protections of end users may be relevant when protecting end users in future switch offs of other networks, particularly when these switch offs can have an impact on end user's rights, such as the right to access emergency communications."

Kind regards,

Peter Lonergan

Policy Officer | European Emergency Number Association - EENA

Email: pl@eena.org | [EU Transparency Register](#) | [Privacy Policy](#)

