



MVNO Europe short-form response to BEREC public consultation: 31 January 2025

Draft Report on Infrastructure Sharing as a lever for ECN/ECS Environmental Sustainability

MVNO Europe appreciates BEREC's various recent initiatives with regard to environmental sustainability in the electronic communications sector, including the draft BEREC Report on Infrastructure Sharing as a lever for ECN/ECS Environmental Sustainability: BoR (24) 186.

The analysis provided by BEREC of existing practices by National Regulatory Authorities (NRAs), in application of EU legislation in force, as well as the related prospective view, is welcome and informative.

Please allow MVNO Europe to briefly articulate the following points in this short-form response.

1. MVNO Europe requests an addition, in the final report, reflecting the fact that wholesale access by Mobile Virtual Network Operators (MVNOs) to the networks of Mobile Network Operators (MNOs) contributes to financing mobile network infrastructure, whilst avoiding costly duplication of network assets. Enabling and promoting MVNOs can be considered as contributing to infrastructure sharing and to spectrum sharing, is by far more environmentally responsible than promoting the build-out and operation of additional parallel physical mobile infrastructures. It is thus consistent with the twin green and digital transitions.
2. Currently applicable horizontal EU legislation affecting all sectors already foresees environmental policy objectives, and the European Electronic Communications Code (EECC) already provides articles (listed and assessed in the draft BEREC Report) empowering NRAs to promote environmental sustainability through infrastructure sharing.
3. MVNO Europe is not in favour of the addition of a new environmental sustainability objective in sector-specific legislation, through the forthcoming evaluation of the EECC or by means an expected Digital Networks Act.

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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