



Connect Europe Response to Draft BEREC Strategy 2026-2030

July 2025

Connect Europe welcomes the opportunity to provide input to the draft BEREC Strategy for 2026-2030. Overall, we would like to stress that BEREC should, in general, primarily focus its ongoing tasks on the issues mandated by EU legislation. We appreciate BEREC's aim of aligning its strategy with the Digital Decade targets for 2030, and support BEREC's commitment to establish structured cooperation mechanisms with EU institutions and other competent authorities.

We believe that the strategy should keep a strong emphasis on the need for efficient investment capabilities. In this regard, we take note of the draft strategy's mention of the EU Competitiveness Compass for the EU, as well as the Letta, Draghi, and Niinistö reports. The need for investment and deregulation should be prominently featured, given the challenges faced by the sector and these assessments regarding competitiveness. Digital infrastructure has become one of the building blocks contributing to Europe's global competitiveness. BEREC's strategy should prioritize the digital transformation and infrastructure in their broader reflection to improve the Union's competitiveness, and explicitly address the challenges faced by the European digital industry. Furthermore, in order to achieve a truly integrated EU telecoms single market, it is crucial that BEREC supports measures aimed at harmonization through deregulation and simplification. This will allow to reduce fragmentation and complexity for operators to enter different markets. We further elaborate on our views below.

Promoting Full Connectivity and the Digital Single Market

We welcome BEREC's continued commitment to connectivity and acknowledge the strategy's inclusion of VHCNs, 5G/6G, NTN and submarine cables. However, while the strategy refers to efficient investment, we believe that BEREC can place a stronger focus on creating the right regulatory environment paired with the appropriate incentives. Further, there should be a focus on investments in new technologies, beyond considering them as a new source of digital divide. Here, the need to close the connectivity investment gap to enable the application of future digital products and services should be mentioned. This is central to achieving the goals outlined by the EU Competitiveness Compass and Letta, Draghi and Niinistö reports that are referenced in the draft strategy.

Regarding fibre roll-out, we note that BEREC mentions its goal of supporting NRAs in their work regarding the migration to fibre networks and copper switch-off while balancing the incentives to carry out this migration. In this regard, the strategy should place more explicit focus on creating incentives for investments into fibre infrastructures, and leave operators enough flexibility to phase-out their legacy networks.

Supporting Competition-Driven and Open Digital Ecosystems

We support BEREC's recognition of convergence and the evolving structure of digital markets. However, we encourage BEREC to go further in supporting a shift away from outdated SMP-based frameworks. There is a need for a fundamentally reformed regulatory framework that only focuses exceptionally on addressing any remaining challenges in an agile and proportionate manner, by supporting investment and the achievement of the digital decade targets. Such an approach should take a forward-looking approach and comprise the following elements, and we encourage BEREC to support this shift effectively:

- Firstly, ex post competition law and the Gigabit Infrastructure Act (GIA) should be the default regime applicable to telecoms.

- Secondly, as a consequence of the above, the EC Recommendation on ‘Relevant Markets’ should rightly be repealed and SMP regulation abandoned as SMP-based regulation is increasingly unfit-for-purpose.
- Thirdly, in exceptional cases when a ‘safety net’ is still necessary, a new approach—instead of SMP—should apply symmetrically to all market players addressing local bottlenecks

The current regulatory and bargaining asymmetries in the internet value chain should be corrected and the regulatory intervention introducing a dispute resolution mechanism between ISPs and large CAPs is necessary to ensure a level-playing-field and that large CAPs pay a fair and adequate price to ISPs for a valuable IP data transport services.

Empowering End-Users

Regarding the aspects of empowering end-users, we are concerned that there is no recognition that European consumers are already the most well-protected in terms of sector specific regulation that has been layered with new requirements on providers for more than three decades. It is concerning that there is no indication of thinking within BEREC as to whether the sector specific consumer protection rules are subject to a much-needed overhaul, removing obsolete requirements, and general alignment with horizontal consumer protection within the EU. For more than a decade, consumers’ uptake of various number-independent services (iMessenger, Snapchat etc.) demonstrates that regulators and consumers have very different observations of what is needed from transparency and information requirement levels. On some of these aspects, we see again that BEREC will work in a silo with no public consultation of those companies who are most impacted by the regulation. We encourage BEREC to increase on transparency and ensure that their own information level is balanced reflecting relevant parties in their work.

Contributing to Environmentally Sustainable, Secure and Resilient Digital Infrastructures

Telecom operators are deeply committed to advancing sustainability across all dimensions, environmental, social, and economic, and are actively implementing strategies and actions to, amongst other things, become net-zero and manage supply chains responsibly. Most of our members have now set net-zero targets for their direct emissions (scope 1 and 2) and also for indirect emission across the value chain (scope 3). Thanks to these initiatives, most of them aim to reach net zero by 2040 at the latest.

We acknowledge that common indicators and measurement approaches are essential to ensure consistent and transparent reporting of environmental impacts to take action and track progress. We stand ready to contribute to the development of a Code of Conduct for the sustainability of telecommunications networks that is practical to implement, and to continue our efforts to measure and reduce the environmental footprint of our sector.

Our sector has been a consistent advocate for shared responsibility in ensuring high levels of security across the whole telecom supply chain. Regarding cybersecurity, telecom operators have a special duty to safeguard their customers from cyber threats and are making significant investments in the security and resilience of their networks. Ensuring a secure and resilient infrastructure is imperative for telcos, as they serve as a “cyber shield” for European society.

We would like to underline that the coexistence of different European cyber risk regulations, management and reporting obligations (e.g. GDPR, NIS2, CRA, DORA, EECC, CER), alongside national



security requirements and different enforcement authorities, risks hampering legal certainty and consistency. Furthermore, reflecting on the relevance of investment and single market objectives to security and resilience is crucial. The investment conditions and the ability to operate networks across borders have significant implications for operators' capacity to invest in network security efficiently.

Strengthening BEREC's Capabilities and Continuous Improvement

We support BEREC's intention to streamline work processes and enhance transparency. Connect Europe believes that BEREC's work would greatly benefit from more transparent processes and a more open debate on its internal work, starting from the earliest stages of a legislative initiative, especially during opinion drafting and internal workshops. This would ensure industry insight is captured and enhance policy quality. Additionally, longer and more flexible consultation periods and greater transparency is needed, for instance by explaining why stakeholder contributions were or were not incorporated. It is rather rare to see them taken into consideration via modifications to the proposed draft text. Finally, four annual plenaries limit responsiveness and creates inconsistent dialogue between BEREC and stakeholders. We propose exploring a better planning of plenaries, or a different process allowing for more regular approvals and consultations, which could make a significant difference.