Full fibre for a digital and sustainable Europe

Response to Draft BEREC Work Programme 2026

3 November 2025

Response to Draft BEREC Work Programme 2026:

The FTTH Council Europe welcomes BEREC's ongoing commitment to competitive, innovative, and sustainable electronic communications markets, as emphasized in the Draft Work Programme 2026. The FTTH Council Europe appreciates the recognition of fibre-based, ultra-high-speed networks as essential drivers of the Digital Decade objectives.

From the FTTH Council Europe perspective, the focus on the upcoming 2026 legislative discussions, whereby BEREC provides expert and independent advice to the co-legislators and the European Commission is crucially important. As an increasingly political approach is taken to legislative initiatives, as a collective of (politically) independent regulators, BEREC can act as counterweight to ensure regulation continues to promote consumer welfare, competition and user rights.

In particular, the FTTH Council Europe welcomes the work under heading 1.2 Fact Finding Report on the competition indicators and regulatory highlights in different jurisdictions as this will allow for a fact-based assessment of the market and appropriate regulatory requirements.

Strategic Priorities Alignment

The five strategic priorities outlined in the Work Programme—connectivity, competition, end-user empowerment, sustainability/security/resilience, and BEREC's own capabilities— are broadly supported by the FTTH Council Europe. However, two key points merit attention:

- **Realistic Connectivity Targets:** While ambitious goals for universal FTTH by 2030 are laudable, they must be balanced with practical implementation plans. Absolute targets risk being unachievable and could undermine credibility. The Swedish model, which sets a 98.5% FTTH coverage target, rightly acknowledges the high cost and impracticality of reaching every remote household with fibre. Targets should be both ambitious and achievable, with clear transition strategies for hard-to-reach areas.

- **Focus and Mission Creep:** BEREC should guard against the dilution of its core mission by expanding its objectives too broadly. Specialist agencies should address new domains (e.g., security) when they fall outside BEREC's direct remit.

Regulatory Reform and SMP Framework

The FTTH Council Europe would like to see a coherent regulatory environment for fibre markets, streamlining SMP ex-ante regulation in mature markets, while maintaining the possibility for ex-ante regulatory interventions in markets with noticeably asymmetrical market structures.

Of course the FTTH Council Europe fully supports the measures to promote full connectivity and the Digital Single Market, the roll-out and uptake of very high-capacity networks (VHCNs) across the EU. The FTTH Council Europe supports sustainable investment, removing deployment barriers, improving cross-border coordination, and helping achieve the Digital Decade connectivity targets by 2030.

The work on section 1.6. *BEREC Report on the application of fair and reasonable pricing within the SMP framework* will be something which the FTTH Council Europe will be happy to work on and contribute to, there is a risk that this provision becomes a backdoor to price regulation rather than, as intended, a protection against excessive pricing.

Copper Switch-Off

BEREC's work under section 1.5. *External Workshop on migration and copper switch-off in light of the DNA* is important and the planned external workshop and ongoing work on migration and copper switch-off is a welcome step towards a coherent approach for managing the transition. The market transition must be managed to avoid fragmentation and ensure fair competition as legacy networks are replaced by FTTH and 5G/6G. Especially, a non-discriminatory switch-off process plays a vital role in this context. Guidance and sharing of best practices are essential to avoid bottlenecks and protect consumer choice.

Competition & Open Digital Ecosystem

The FTTH Council Europe agrees with BEREC that open, competitive markets drive innovation and consumer welfare, but warns of trends towards market consolidation. In-country consolidation risks reducing competition and must be carefully monitored.

Regulatory actions should focus on lowering entry barriers for new and innovative players, including disruptive technology suppliers (e.g., Open RAN, cloud-native business models).

In mature markets, measures should be mostly symmetric, simple, and transparent, facilitating fair access and avoiding manipulation by dominant actors. In these markets, SMP interventions should be rare, and lighter, post-hoc regulatory tools should be preferred. In markets characterised by a stronger imbalance between incumbent and alternative operators, SMP based regulation remains important to foster fibre deployment and take-up.**Empowering End-Users**

Low demand—linked to skills, content, and other social factors—remains a major issue and merits targeted policy measures. Further restrictions on service availability and development should be avoided, as these could act as a disincentive to deploy new technologies and service models (AI-driven management, IoT, edge computing). Work in section 3.4. *Implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines* could usefully address these issues.

End-user protection and inclusion must remain a core theme in regulatory development.

Sustainability, Security, and Resilience

FTTH networks have a better environmental profile than alternatives; regulatory frameworks should recognise and reward this, for example, through inclusion in the EU Taxonomy. Sustainability standards should be outcome-based, and security measures should be risk-based and proportionate, ensuring innovation and supply chain resilience are not compromised. BEREC's planned contribution to the future Code of Conduct on ECN/ECS and work on sustainability indicators are positive steps.

Institutional and International Cooperation

BEREC's approach to stakeholder engagement—including public consultations, workshops, and transparent processes—is widely supported. The FTTH Council Europe encourages continued structured dialogue to ensure regulatory approaches reflect market realities. Continued focus on evidence-based, impartial regulation will consolidate BEREC's reputation as a trusted expert body.

Overall, the FTTH Council Europe supports the priorities and planned actions of the Draft Work Programme but urges BEREC to:

- Ensure targets are realistic and transition strategies are credible.

- Simplify the SMP and access regulation frameworks for fibre in mature fibre markets.

- Ensure SMP based ex-ante regulation is available in more structurally asymmetric markets

- Balance ambition with focus to avoid mission creep.

- Maintain a robust, pro-competitive environment—especially during copper switch-off and market consolidation.

- Recognise the superior environmental credentials of FTTH.

- Continue and deepen stakeholder engagement for effective regulatory development.

We look forward to contributing to the upcoming consultations, workshops, and policy development processes.