

Body of European Regulators for Electronic Communications
Zigfrida Annas Meierovica boulevard, No 14
LV-1050, Riga
Latvia

via eMail: berec_strategy_pc@distro.berec.europa.eu

Re: Public Consultation on Draft BEREC Strategy 2026 – 2030 - BoR (25) 80

15 July 2025

Dear Sir/Madam,

Transatel is a pan-European provider of connectivity solutions for IoT/M2M/Connected Vehicles and a leading Mobile Virtual Network Operator Enabler (**MVNE**). As an MVNE, we support over 120 Mobile Virtual Network Operators (**MVNOs**) managed on our own full core network. A pioneer in IoT/M2M/Connected Vehicles connectivity, Transatel simplifies pan-European deployments of such services through a single integration with our connectivity management platform, which leverages LTE, 3G, 4G, and 5G network access agreements with over 250 mobile network operators (MNOs) worldwide. Today, Transatel's SIMs and eSIM securely connect millions of vehicles, industrial and consumer devices to public and private cellular networks for clients such as BMW, Airbus, Worldline, Stellantis, and Jaguar Land Rover.

Transatel welcomes the opportunity to submit its response to the public consultation by the Body of European Regulators for Electronic Communications (**BEREC**) on its Draft Strategy 2026 - 2030.

Transatel would like to sincerely thank BEREC and its members for the strong and principled stance taken on its 11 July 2025 response to the European Commission's Call for Evidence on the Digital Networks Act (**DNA**). We especially welcome BEREC's robust defence of effective competition, the protection of end-user interests, and the continued relevance of the Significant Market Power (**SMP**) regime. These are foundational pillars of the EU regulatory framework, and we are grateful that BEREC has reaffirmed their importance in its response to the Commission. We strongly encourage BEREC to maintain and actively promote this position throughout the upcoming legislative cycle, ensuring that competition and consumer welfare remain at the heart of Europe's digital future.

Transatel support the overall direction and ambition of the strategy, while respectfully offering several targeted recommendations to ensure it remains firmly grounded in the EU legal framework and responsive to market realities. These targeted recommendations are as follows:

1. Transatel urges BEREC to more explicitly recognise the essential role of MVNOs in fostering competition, innovation, and cross-border connectivity within the EU's electronic communications markets. MVNOs:
 - Deliver competitive pressure and tangible benefits to end-users across many Member States.
 - Operate across borders, serving consumers, SMEs, and industrial sectors.
 - Act as key enablers of the EU Single Market, particularly for M2M/IoT/Connected Vehicle connectivity.

Whiles these services are already being delivered on a pan-European basis under the current legal framework. However, without fit-for-purpose wholesale mobile access, the vision of a genuine EU Single Market for electronic communications cannot be achieved as both MVNOs and MNOs depend on wholesale access and permanent roaming to provide pan-European M2M/IoT/Connected Vehicle connectivity.

We respectfully request that BEREC amend the relevant sections of the draft strategy (notably page 7, paragraph 2/top of page 8) to reflect these realities and the contributions of MVNOs.

2. The general objectives laid out in Article 3(2) of the European Electronic Communications Code (**EECC**) must remain BEREC's sole guiding principle. We caution against any extension beyond these objectives, as they are the only ones that reflect the current EU legislative framework. Any reassessment of BEREC's strategic priorities should only be considered if the EU legislative framework is amended and such amendments have entered into force.
3. While Transatel fully acknowledges the importance of environmentally sustainable, secure, and resilient digital infrastructures, we are concerned by BEREC's proposal to present these elements as a standalone strategic priority. Although commendable, these objectives are not currently defined under Article 3(2) of the EECC. Elevating them to the level of a strategic priority for BEREC risks misalignment with the existing legal framework and could unintentionally weaken the focus on the core objectives. We therefore urge BEREC to reformulate the title and framing of this section to reflect its supporting role, rather than positioning it as a strategic pillar.
4. Transatel calls on BEREC to continue its coordinated effort with National Regulatory Authorities (**NRAs**) to deliver on further simplification and harmonisation of the regulatory framework, a beneficial objective widely acknowledged across the digital ecosystem.

5. This effort could initially prioritise:

- Streamlining notification requirements for general authorisations.
- Reducing and aligning periodic reporting obligations.
- Clarifying and harmonising conditions linked to general authorisations.

These reforms are essential to reduce administrative burdens, foster innovation, and enable cross-border services, particularly for pan-European providers of connectivity solutions for IoT/M2M/connected vehicles, as well as MVNOs/MVNEs offering services in multiple Member States.

Transatel would like to thank BEREC for the opportunity to comment on this consultation. Should BEREC require any additional information or clarification on any elements set out in Transatel's response, please do not hesitate to contact me by email: [REDACTED]@transatel.com

Yours sincerely,

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Head of Regulation and Policy