



Public consultation on the Draft BEREC Work Programme 2026

03 November 2025



Introduction

Twilio appreciates the opportunity to provide comments on BEREC's draft Work Programme of 2026. We welcome the five high-level strategic priorities of:

1. Promoting full connectivity;
2. Supporting sustainable and open digital markets;
3. Empowering end-users;
4. Contributing to Environmentally Sustainable, Secure, and Resilient Digital Infrastructures; and
5. Strengthening BEREC's Capabilities and Continuous Improvement.

More broadly, we welcome BEREC setting out solid deliverables under each high-level priority and look forward to further engaging with BEREC in the achievement of these priorities throughout 2026. BEREC's intention to increase knowledge and understanding through internal and external workshops is a welcome development and Twilio stands ready to contribute our experience as a B2B Cloud Communications provider operating across Europe, particularly in the context of BEREC's planned input into the review of the EECC and its proposed analysis of the DNA.

Twilio's recommendations to BEREC aim to promote a truly competitive, open, and innovative Digital Single Market through the following actions:

- **Harmonisation:** Particularly through KYC, SMS Sender IDs, national reporting, and numbering (including a permissive subassignment framework), and general authorisation; and
- **Developing a flexible and future-proof regulatory framework** to enable B2B cloud-based services across the single market.

Our contribution details how to achieve these objectives in line with the five strategic priorities:

Strategic Priority 1: Promoting full connectivity and the Digital Single Market

Twilio welcomes BEREC's calls for harmonisation in regulation and its implementation across the EU. We strongly agree that legal certainty is crucial in incentivising investment in the



connectivity sector, with direct benefits to businesses and EU citizens, allowing them to access reliable, high-performance connectivity at an affordable cost.

Our cross-border experience has been one of extreme fragmentation detracting from the Single Market, coupled with the subjective implementation of EU legislation that is inherent in the process of transposing a Directive, as well as duplication and redundancy across different regulatory regimes.

Current telecommunications rules are not agile enough to keep up with innovation, and do not provide consistency for the digital age. This will only undermine the uptake across the EU of the new solutions that innovation including cloud communications technology provides and have knock-on effects on Europe's competitiveness and economies, as well as meeting Digital Decade targets.

BEREC's assessment of the EECC against its objectives and its input into the DNA as it proceeds through the legislative process offers an opportunity to examine these issues in more detail. Twilio suggests that more formalised outputs on the following issues would be extremely valuable for BEREC to consider:

Harmonisation of numbering and subassignment requirements under a permissive framework for trusted ECS providers

A key goal for the EU is to facilitate seamless service provision throughout the Single Market under a permissive, clear and predictable regulatory environment. The current fragmented and sometimes restrictive rules for subassignment impede this goal. At present, Member States across the EU have adopted a wide variety of approaches to subassignment, often without due considerations of the ecosystem extending beyond incumbents, and the impact on businesses relying on digital communications services. The restrictive approaches on the one hand, and fragmentation/lack of consistency, at best creates complexity and uncertainty for service providers operating across borders, and at worst prevents the availability of much wanted services to businesses across the EU, impacting their ability to grow.



Harmonisation of KYC, SMS Sender IDs, and national reporting requirements, and branded calling as an opportunity to reduce fraud

Harmonisation needs to also take place in other areas where fragmentation exists, such as Know Your Customer (KYC) obligations, and where it is at increased risk of manifesting such as SMS Sender IDs. We are witnessing a divergence in KYC regimes across Member States, leading to inconsistent standards, unpredictable administrative burdens, and uncertainty for both providers and business users. The varying structure and implementation timelines among national KYC requirements threaten to create lasting fragmentation, stifling the ability of providers (including B2B providers like Twilio) to roll out secure and compliant services EU-wide.

With regards to SMS Sender ID registries, the experience of implementation in Ireland highlights the importance of working with industry to implement solutions, and the importance of providing the time necessary to ensure that the value chain delivers the changes needed, and that there is no disruption of service. In what is a very complex set of processes, and the same policy objectives involved, we would suggest that one model (the one in place in Ireland) is the standard to be set where countries opt to put such registries into place.

Additionally, we urge the BEREC to take action to streamline and harmonise national reporting requirements for communications providers. This is particularly important for B2B and providers operating across multiple territories across the Single Market. Providers are currently subject to different reporting frequencies, formats, and platforms depending on the Member State, creating inefficiencies that offer little benefit to authorities or users. Harmonising, centralising and unifying reporting standards would support regulatory oversight while freeing up significant resources for innovation and customer service.

Finally, branded calling - where verified identifiers to consumers (such as logos, company names, etc) appear on a recipient's screen instead of just a phone number - exemplifies why a streamlined, innovation-friendly rulebook is so vital.

A proactive approach to enable trusted and verified branded calling would enable operators to invest in robust authentication frameworks that drastically cut malicious call-spoofing and scam rates, boost consumer confidence, and allow SMEs to scale services internationally without navigating a patchwork of national mandates.



Embedding support for branded calling into a harmonised EU framework would not only accelerate its rollout across borders, but also reinforce the broader agenda of simplifying obligations, with operators focusing on delivering value-added services. In this way, Branded Calling becomes both a use case and a catalyst for the very regulatory modernisation - driving trust, competition, and the Digital Single Market forward.

Prioritise flexible, future-proof policy

Twilio greatly appreciates BEREC's attention and willingness to contribute to assessing the latest developments in wireless connectivity, including those regarding cloudification and 'as a service' models featuring Application Programming Interfaces (APIs). As highlighted in our previous submissions, the cloudification and virtualisation of networks continue to drive innovation in the electronic communications sector, and the growth of Communications Platform as a Service (CPaaS) providers is a key part of this transformation. In this context, Twilio encourages BEREC to prioritise flexible, future-proof policy frameworks that recognise the distinct nature of cloud-based service providers, who, unlike traditional providers, are not dependent on physical infrastructure and are therefore well-positioned to operate seamlessly across borders. Emerging technologies and innovative business models, such as programmable cloud communications and API-based services, should not face legal or regulatory hurdles, or use case discrimination, simply due to their novelty or divergence from legacy models and use cases. Twilio welcomes BEREC's intention to seek input on interfaces to mobile networks for developers and third-party services.

Strategic Priorities 2&3: Supporting competition-driven and open digital ecosystems& Empowering end-users

Twilio is committed to BEREC's objective to ensure transparency and protect end-users as markets evolve. At the same time, we urge BEREC to recognise B2B electronic communications services are fundamentally different from consumer-facing (B2C) offerings.

Rules designed for traditional telecom or B2C services should not be imposed as-is on B2B providers, whose business relationships, technical roles, and customer expectations differ markedly - especially in cloud-based communications. B2B service providers typically do not process traffic or access end-user data in the same way as retail operators owning and running significant infrastructure networks. Requirements around transparency, reporting, data



protection, security, and consumer protection must be right-sized for B2B contexts, and ensure there is no duplication or multiplication in requirements from other EU and national legislation.

As already stated, Twilio would encourage BEREC to explore ways to further engage with B2B providers to discuss with NRAs the opportunities presented by the sector and the current impediments to realising them.

Strategic Priority 4: Contributing to environmentally sustainable, secure and resilient digital infrastructures

Twilio strongly welcomes BEREC's collaboration with ECASEC and ENISA on important security-related issues and looks forward to the opportunity to participate in the external workshops planned for 2026. Twilio urges caution in developing overly broad or prescriptive new guidelines and urges BEREC and other agencies to ensure any measures reflect the evolving character of the pan-European communications ecosystem and ensure that frameworks are proportionate, targeted, and accurately reflect the roles different actors play within the digital communications ecosystem.

Strategic Priority 5: Strengthening BEREC's capabilities and continuous improvement

Twilio commends BEREC's ambition to strengthen its role as an independent, efficient, expertise-driven, and inclusive interlocutor. It is a critical moment where BEREC can become central to designing the rules for tomorrow, as an independent body that is looking to update and harmonise rules as we evolve the Single Market.

BEREC should be further empowered, and continue to do this in an inclusive manner reflecting the evolving communications ecosystem that includes multiple players that are important enablers of innovation and new technology.

Twilio supports BEREC's focus on data-driven regulation and it must continue to ensure there is a clear and inclusive approach to any rule design, with open engagement with all stakeholders.

Twilio looks forward to continued collaboration with BEREC in 2026.