



A1 Group's Response to the Draft BEREC Strategy 2026–2030

A1 Group welcomes the opportunity to provide input on the draft BEREC Strategy 2026–2030. We appreciate BEREC's intention to align its strategic priorities with the objectives of the Digital Decade, however, we believe the strategy should place stronger emphasis on promoting efficient investment conditions, simplifying regulation, and supporting the transition to a truly integrated EU telecoms market. In particular, we encourage BEREC to take note of the broader momentum reflected in the EU Competitiveness Compass and recent high-level reports (Letta and Draghi) that highlight the need for enhanced competitiveness, investment, and scale in Europe's digital sector.

Enabling Full Connectivity and a Seamless Digital Single Market

We support BEREC's recognition of the importance of connectivity, however, we believe BEREC should go further in shaping a regulatory environment that facilitates private investment by reducing complexity and fragmentation.

The migration to fibre and switch-off of legacy networks should be driven by investment signals and commercial incentives, not prescriptive rules. Operators should have the flexibility to adapt their roll-out and phase-out plans based on market realities.

5G network slicing and specialised services offer a major opportunity to support the digitalisation of European industry and the public sector. BEREC should explicitly recognise and support the development of such differentiated network capabilities, which rely on tailored quality parameters (e.g. latency, throughput, resilience). Regulatory frameworks should ensure that operators can commercially offer network slices and specialised services without unnecessary restrictions, in line with net neutrality rules that preserve room for innovation. Encouraging investment in customised and high-performance connectivity solutions is essential for enabling new business models and industrial transformation in Europe.

Modernising the Regulatory Framework: Moving Beyond SMP

The current SMP-based regulatory framework is outdated and misaligned with market developments. We urge BEREC to support a shift towards bilateral commercial agreements as the foundation for market access – with symmetric access obligations only applying in clearly defined bottleneck scenarios. Where safeguards are necessary, these should be based on objective and location-specific criteria and apply equally to all operators, rather than sustaining outdated asymmetries.

Instead of sustaining legacy frameworks, BEREC should:

- Promote the Gigabit Infrastructure Act (GIA) and general competition law as the baseline regulatory approach
- Support the repeal of the EC Recommendation on Relevant Markets
- Encourage light-touch and proportionate regulation, avoiding market definitions and SMP procedures wherever possible

Ensuring Fair Conditions in the Internet Value Chain

The strategy should acknowledge the growing imbalance in the internet ecosystem, where network operators bear rising costs without adequate compensation from large traffic generators. A1 Group supports the introduction of a targeted dispute resolution mechanism that ensures fair contributions from large content and application providers (CAPs) to maintain high-quality and resilient IP networks.

Empowering End-Users Through Smarter Regulation

European telecom users are already among the most protected consumers globally. The strategy should address the need to streamline outdated sector-specific rules and align them with horizontal EU consumer law. We caution against layering new requirements without a proper evaluation of existing obligations.

Promoting Security & Resilience

Cybersecurity remains a top priority for our sector. However, the current patchwork of obligations (GDPR, NIS2, CRA, DORA, EECC, CER) creates legal uncertainty and should be streamlined. A coherent, risk-based approach to cybersecurity and resilience, aligned with single market objectives and cross-border operations, is essential to facilitate efficient investment and deployment.