2026

Work Programme

BEREC

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2026
Work Programme

BEREC

Body of European Regulators
for Electronic Communications

BEREC aims at fostering independent, forward looking, consistent and high-quality regulation of digital infrastructures and services for the benefit of Europe and its citizens

Table of Contents

Table of Contents

Table of Contents

I. Introduction

Robert Mourik

BEREC Chair 2025

The Body of European Regulators for Electronic Communications (BEREC) was established in 2009 and now operates under Regulation (EU) 2018/1971 (the BEREC Regulation) with the aim of pursuing the objectives under the Directive (EU) 2018/1972 of the European Parliament and the Council establishing the European Electronic Communication Code (EECC) and, in particular, ensuring the consistent implementation of the regulatory framework for electronic communications.

The priorities for 2026, as identified by the Board of Regulators, are set out in the BEREC Work Programme. Such priorities are non-exhaustive, and may be complemented by other emerging topics of interest during the year.

The objectives of this Work Programme are based on the BEREC Strategy 2026-2030 (BoR (25) 189), with a close focus on its high-level strategic priorities: (1) promoting full connectivity and the Digital Single Market; (2) supporting competition-driven and open digital ecosystems; (3) empowering end-users; (4) contributing to environmentally sustainable, secure and resilient digital infrastructures; and (5) strengthening BEREC's capabilities and continuous improvement. This Work Programme also reflects BEREC's institutional and international cooperation.

This Work Programme seeks to be consistent with the vision, targets and roadmaps for Europe's digital transformation by 2030, set out in the Digital Compass and the Policy Programme 'Path to the Digital Decade', the EU Global Gateway strategy (2021) and the European Green Deal (2020). In addition,

The Work Programme 2026 aims to align with the new EU priorities of the European Commission regarding electronic communications. The European Commission introduced an EU Competitiveness Compass for the EU in January 2025 as a roadmap to restore Europe's global competitiveness while ensuring secure and sustainable prosperity. The Compass emphasises regulatory simplification and single-market integration and includes key initiatives for accelerating infrastructure investment, such as the Digital Networks Act (DNA), the EU Cloud and AI Development Act, the Space Act, and measures for strengthening the EU's role in AI.

BEREC's priorities are in line with the EU Competitiveness Compass (2025), in particular its emphasis on restoring Europe's digital competitiveness through regulatory simplification, investment incentives, and proportionate solutions that respect the structural diversity of Member States' markets. The Compass will therefore serve as a horizontal benchmark for the entirety of this Work Programme.

This Work Programme was developed against the backdrop of the review of the regulatory framework for electronic communications and in the context of preparations for the upcoming DNA, which is to be submitted to the co-legislators by the end of 2025, which may – together with the review of the EECC and the BEREC Regulation – allow for simplification and further harmonisation and upgrading of the current sectoral rules. This Work Programme focuses on the upcoming 2026 legislative discussions, and provides expert independent advice to the co-legislators and the European Commission.

In addition to the expected legislative changes, institutional changes may also arise as the Commission intends to carry out an evaluation in compliance with the its guidelines and, thereby, assess the performance of BEREC and the BEREC Office in relation to their objectives, mandate, tasks and location. In particular, the evaluation shall address the possible need for modifying the structure or mandate of BEREC and the BEREC Office, and the financial implications of any such modification. BEREC will, in any case, continue to actively contribute with its expertise to support evidence-based policymaking and implementation.

Regarding the promotion of full connectivity and the Digital Single Market, BEREC will continue to support the roll-out and uptake of very high-capacity networks (VHCNs) across the EU. It will focus on enabling sustainable investment, removing deployment barriers, improving cross-border coordination, and helping to achieve the Digital Decade connectivity targets by 2030. In terms of supporting competition-driven and open digital ecosystems, BEREC will closely monitor evolving digital value chains, including the increasing interdependence between electronic communications and digital services and infrastructure, specifically, cloud services. The objective is to maintain and promote fair competition, encourage innovation, and prevent new market bottlenecks while ensuring the regulatory framework remains proportionate and future-proofed. When it comes to empowering end-users, BEREC will place a strong focus on user rights, including contract clarity, switching, accessibility and affordability. It will also consider how emerging technologies such as AI, metaverses and extended reality may impact the end-user experience, privacy and trust, with particular attention being paid to digital inclusion and bridging the digital divide. In relation to contributing to environmentally sustainable, secure and resilient digital infrastructures, BEREC aims to support the green and digital transitions by encouraging energy efficiency, sustainability and circular practices within the sector. At the same time, it will promote stronger cybersecurity and network resilience in response to evolving threats and increasing dependence on digital infrastructure. Lastly, regarding strengthening BEREC's capabilities and continuous improvement, the organisation will focus on enhancing its internal agility, knowledge base and transparency. It will improve data gathering and analysis, reinforce collaboration among National Regulatory Authorities (NRAs), and build deeper institutional and international partnerships in order to remain an independent and reliable source of regulatory expertise.

The 2026 Work Programme has been developed in an inclusive and transparent manner, involving contributions from BEREC's Working Groups, NRAs, EU institutions and other relevant stakeholders. It also addresses feedback received via public consultations and the annual Stakeholder Forum. Such input helps to ensure that BEREC remains responsive to market needs, regulatory developments and end user expectations.

BEREC will continue to explore innovative networks and emerging technologies so as to be prepared for future potential impacts on regulation in the sector. This approach will be an integral part of all projects outlined in this Work Programme.

Marko Mišmaš
BEREC Chair 2026

II. Background

The Work Programme 2026 seeks to address current regulatory challenges and prepare BEREC for future new challenges resulting from public policy, economic, social, technological and political developments. The objectives of this Work Programme are based on the new BEREC Strategy 2026-2030.

The four objectives in Article 3(2) of the EECC remain the foundation for the work set out in BEREC's annual work programmes and are the guiding force for the Work Programme 2026. These four objectives, intended also to promote efficient investment and innovation, serve as the strategic foundation of the assignments set out in BEREC's multi-annual work programmes and its guiding force. These are (1) promoting connectivity and access to VHCN; (2) promoting competition and efficient investment; (3) contributing to the development of the internal market, and; (4) promoting the interests of the EU citizens. In its 2030 Action Plan, BEREC developed these priorities into building blocks with the aim of shaping regulatory activities in the coming years.

The EECC, the BEREC Regulation and mandatory tasks resulting from the relevant legislative instruments provide the basis for the BEREC Work Programme 2026. BEREC acknowledges the current ongoing review of the regulatory framework, including the possible governance changes that it may imply. While contributing to these exchanges in its role as expert advisory body of the EU institutions, BEREC's work will be based on and aligned with the legislation in force.

In addition to the EECC, the EU Competitiveness Compass (2025) with its focus on competitiveness-enhancing reforms, digital sovereignty and proportionate regulatory frameworks is a key reference point for BEREC. This ensures that regulatory interventions avoid one-size-fits-all models and instead promote differentiated and evidence-based solutions which are suited to national contexts.

The Work Programme 2026 contains items launched in 2025 which will be completed in 2026, several ad hoc or recurring items, and new proposals that have been identified and prioritised by BEREC members and stakeholders which will commence in 2026 and conclude in either 2026 or 2027. During the call for proposals, several additional actions were identified. While considered relevant, they are not yet pressing enough to be considered for implementation. These proposals are intended to serve as input for future reflection and are outlined in the final chapter.

According to the BEREC Regulation, when developing its annual work programme, BEREC must seek the views and proposals of the EU institutions and other interested parties. BEREC therefore organises a forum for stakeholders (the Stakeholder Forum) to enhance transparency and give stakeholders an opportunity to express their views on BEREC's current and future work, in particular, with regard to the preparation of its work programmes.

The Outline BEREC Work Programme 2026 was adopted and published by the Board of Regulators on 30 January 2025. On 3 March, BEREC launched an early call for input as the first stage of the consultation process for the Work Programme 2026. The Stakeholder Forum was held on 1 April 2025. The public consultation on the Draft Work Programme 2026 was launched on 3 October 2025.

III. BEREC work in 2026

The objectives of the BEREC Work Programme 2026 are based and aligned with the BEREC Strategy 2026-2030 and its five high-level priorities (Promoting full connectivity and the Digital Single Market; Supporting competition-driven and open digital ecosystems; Empowering end-users; Contributing to environmentally sustainable, secure and resilient digital infrastructures, and; Strengthening BEREC's capabilities and continuous improvement) and the priorities set for institutional and international cooperation.

The BEREC Strategy 2026-2030 is based on both market-related and technological developments, as well as on policy and legislative developments, and relates to the overarching objectives of the EECC. In addition, it reflects the building blocks of the BEREC 2030 Action plan which aim to shape its regulatory activities in the coming years. Along with these priorities, other important horizontal principles that form an essential part of the high-level priorities include facilitating successful implementation and consistent application in all areas of the EECC, incorporating market-shaping aspects of spectrum assignment, universal service, sustainability, security, resilience and consumer protection. In this context, BEREC will continue monitoring developments in digital markets and emerging electronic communication services (ECS) in order to anticipate any potential regulatory needs in a fast-changing environment.

The European Commission is required to publish an assessment of the functioning of the EECC by 21 December 2025. This review will likely be followed by a legislative proposal of the DNA. BEREC will analyse the proposal over the course of 2026. BEREC is committed to contributing fact-based input based on the expertise of its member NRAs. These activities will constitute a key area of work for BEREC in 2026.

It should be noted that BEREC plans to hold a number of workshops, both internal and external, as part of its Work Programme 2026. The purpose of internal workshops is to enable BEREC members to harness the opportunity to explore different topics and increase their knowledge and understanding of the issue(s) at hand. This may include inviting external experts to assist BEREC members assessing whether there is an issue that could lead to future work for BEREC. External workshops are more focused on exchanging views and experiences interactively with stakeholders on particular topics of interest. BEREC will make available summary reports on the topics discussed at external workshops, as well as recordings, where deemed appropriate.

A detailed description of the main projects to be carried out by BEREC in 2026 is detailed in the following sections.

1. Strategic priority: Promoting full connectivity and the Digital Single Market

Connectivity has a pivotal role in today's society and economy given its multifaceted and evolving strategic importance across sectors. BEREC will continue to promote ECN/S by adopting a comprehensive approach to its work, that encompasses all key infrastructures (land, space and submarine), including fixed, wireless, emerging virtual and cloud-related developments as well as the underlying empowering digital infrastructures and technologies.

BEREC will aim to ensure the harmonised application of European legislation so as to incentivise operators to invest efficiently by fostering predictability, and to empower EU citizens and businesses to benefit from high-quality connectivity at affordable prices. At the same time, BEREC will support policies and regulatory instruments strengthening competition and efficient infrastructure investment as well as innovation. BEREC will also contribute to more horizontal legislative processes to ensure consistent regulatory implementation of all applicable rules regarding connectivity. BEREC's work is focusing on promoting access to connectivity infrastructures, enhancing coverage and take-up, while supporting standardisation and interoperability efforts.

With specific regard to VHCN, BEREC will continue to prioritise initiatives that improve the development and adoption of secure, competitive and reliable VHCN both fixed and wireless across Europe. BEREC will also provide for the consistent implementation of related legislative obligations and incentives to deploy advanced networks. BEREC will continue to support NRAs in their work regarding the migration to fibre networks and copper switch-off. BEREC will contribute to work regarding the migration to 5G SA (Standalone) and to the setting-up of 6G networks. BEREC will also follow if backhauling demand for these networks is met. BEREC will continue to examine the development of relevant digital infrastructures and services.

In line with its comprehensive approach to connectivity, BEREC will continue to analyse key network trends in wireless connectivity, with focuses on examining shared mobile and wireless access, seamless connectivity between mobile and fixed networks, assessing the impact of Edge computing, cloudification, softwarisation, and 'as-a-service' models including Application Programming Interface (API) developments.

The evolving strategic function of non-terrestrial networks (NTNs), their interplay with terrestrial infrastructures, and the broader implications they may play in the provision of connectivity are topics that BEREC remains ready to contribute to.

With regard to connectivity provided by submarine cables, BEREC will continue to follow their roll out and resilience.

BEREC will also continue to play a fundamental role in relation to the Roaming Regulation, which represents a key pillar of the European Single Market. BEREC remains committed to closely monitoring market and technological developments, as well as competitive aspects in the field of Machine-to-Machine (M2M) communications and the Internet of Things (IoT). Furthermore, BEREC will continue to support developments in the regulation of intra-EU communications.

1.1. Call for input on interfaces to mobile networks for developers and third-party services

This work aims to explore Application Programme Interfaces (APIs) to mobile network functionalities. BEREC observes the GSMA's Open Gateway initiative, which aims to provide an Open Standard API to mobile network functionalities, which can, in turn, be used by application makers.

BEREC's interest in this initiative includes, among others, several questions with regard to development and deployment of such interfaces. Which (categories of) different deployments can be distinguished? What challenges are there with potential impact for markets and end users, for instance with regard to choice and switching providers (both of services as well as network providers? How are prices composed (e.g. towards end-users and developers, across operators and countries)? How is uniformity of the interface maintained for all MNOs and MVNOs (world-/region-wide)? Which procedures are in place for maintenance, extension, bug fixing, backward compatibility and phasing out of services. In what respects are vendor or operator lock-ins avoided, etc?

In addition, the aim is to get a sense of the maturity of use cases and to examine the impact of new use cases on the configuration of mobile networks including how these kinds of functionalities operate in the context of (pan-European) slicing, for instance harmonising slicing features between operators and EU countries. BEREC therefore intends to issue a call for input to equip itself with information on this initiative, the responses received will be published and the information may contribute to future work by BEREC

Deliverable: External call for input
Public consultation: No
Adoption of the Call for input for publication in Q2 2026
Deliverable 2: Summary report
Public consultation: No
Adoption of the summary report at Plenary 4, 2026

1.2. Fact finding report on competition indicators and regulatory highlights in different jurisdictions

The The overall context of the telecommunications markets is adapting to current realities, with traditional electronic communications operators facing major changes in their business models, MNOs divesting their towers and sites in favour of independent infrastructure companies, digital players entering the sector and investing heavily in own infrastructure for the delivery of end-user services and, lastly, increasing public funding being used for the development of connectivity in economically non-attractive areas. Looking ahead, co-investment between telecoms operators jointly deploying VHCNs, as well as the conclusion of strategic partnerships between various actors across the value chain, is expected to re-shape the communications ecosystem. Mergers and acquisitions will also play an important role as means for operators to secure assets and increase resilience. All these developments in the European market provide a changing competitive landscape in terms of, on the one hand, the degree of concentration and competition on the various markets and investment in VHCN, and company ownership (covering the entry of investment firms as shareholders) or profits, on the other.

In order to inform the impact that these changes are likely to have on the sector, in 2026, BEREC will continue to consider key competitive indicators in various jurisdictions so as to put together a comprehensive collection of data to depict, from a quantitative perspective, anticipated trends. BEREC will address the reach and take-up of broadband networks, services' pricing and quality aspects, as well as consolidation trends in the sector, access regulation as an enabler of good performance, and profitability-related aspects. This report is intended to shed light on the current state of telecoms markets in the EU by means of comparison with other jurisdictions in the world.

In terms of jurisdictions to be covered, a lot of attention has been attracted by players in the US, as well as in Asia, and the link between the regulatory measures applicable in those regions and the corresponding competitive situation, with parallels to be drawn with the situation in Europe. Depending on the availability of data, BEREC aims to present information from USA, Canada, Australia, China, South Korea and Japan, alongside Europe.

Deliverable: Fact Finding Report on the competition indicators and regulatory highlights in different jurisdictions
Public consultation: Yes
Adoption of the draft report for public consultation at Plenary 1, 2026
Adoption of the final report at Plenary 3, 2026 for publication
Adoption of the outcome of the consultation Summary Report at Plenary 3, 2026 for publication

1.3. | BEREC Report on Virtual Worlds and Web 4.0

Virtual worlds may have a significant economic and social impact by transforming the way online content and applications are accessed through immersive experiences. Virtual worlds are part of a wider technological change; the transition towards Web 4.0. The relevance of this trend has been acknowledged by the EU institutions.

On 11 July 2023, the European Commission published a strategy on Web 4.0 and virtual worlds[1], which was accompanied by a Staff Working Document regarding information, insights and market trends on web 4.0 and virtual worlds[2].

On 17 January 2024, the European Parliament adopted an IMCO own-initiative report on Virtual worlds focusing on the opportunities, risks and policy implications for the single market[3]. In the report, the Parliament makes a call for concrete input on these emerging technologies. As these technologies reach maturity, the Parliament considers that a regulatory framework should be established to ensure a level playing field that harnesses the full potential of virtual worlds and enables their economic growth. The issues addressed in the Parliament report include the need for investment in infrastructure, the role of crucial technologies (e.g. AI, XR, 5G, edge computing, etc.), interoperability and open standards to prevent quasi-monopolies or abuses of dominant position, the need for addressing the specific needs of people with disabilities when interacting with virtual worlds, ensuring equal access to vulnerable users and those in less accessible areas, and identifying new dangers (fraud and scams) in this new context.

This deliverable would contribute to developing BEREC's high-level position on artificial intelligence and virtual worlds (BoR (24) 68), which was provided as input to two calls for contributions[4] on competition in generative AI and Virtual Worlds launched on 9 January 2024 by the European Commission. It would incorporate considerations on, among other issues, the underlying technologies supporting the virtual worlds and web 4.0, the interdependences among the different technologies, investments required, related environmental issues, and potential competition and openness/standardisation bottlenecks for their development, as well as the impact on end users' rights and inclusiveness.

Deliverable: BEREC Report on Virtual Worlds and Web 4.0
Public consultation: Yes
Adoption of the draft report for public consultation at Plenary 1, 2026
Adoption of the final report at Plenary 3, 2026 for publication
Adoption of the outcome of the consultation Summary Report at Plenary 3, 2026 for publication

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[1]   https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3718.

[2]   https://digital-strategy.ec.europa.eu/en/library/staff-working-document-information-insights-and-market-trends-web-40-and-virtual-worlds.

[3]   https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2022/2198(INI)&l=en.

[4]   https://ec.europa.eu/commission/presscorner/detail/en/IP_24_85.

1.4. BEREC Opinion on the Recommendation on relevant markets susceptible to ex ante regulation

According to Article 64 of the EECC, the European Commission shall review the Recommendation on Relevant Product and Service Markets on a regular basis. The Recommendation shall identify those product and service markets within the electronic communications sector, the characteristics of which may justify the imposition of regulatory obligations set out in the EECC. This shall be done without prejudice to markets that may be defined in specific cases under competition law. The European Commission will review the 2020 Recommendation as per Article 64 (1). The European Commission must take into utmost account the BEREC Opinion on this Recommendation.

BEREC will issue an Opinion based on the documents supporting the Recommendation's review and its draft text proposal, which is to be communicated by the European Commission. BEREC is committed to participate actively in the process and, given the importance of this Recommendation for market analyses, BEREC will participate in exchanges and workshops with the European Commission, as deemed necessary in order to ensure that BEREC's questions and concerns are clarified and addressed, as well as to provide the European Commission with developments in NRAs' knowledge regarding the functioning of the markets.

Following the stakeholders' request to organize an external workshop in order to discuss the industry's perspectives on the revision of the Recommendation, BEREC has taken the suggestion on board and includes such a workshop in the Work Programme 2026. The exact timing is still to be determined, but the event will be publicized in due time.

Deliverable 1: BEREC Opinion on the Recommendation on relevant markets susceptible to ex ante regulation
Public consultation: No
Publication: Yes
Adoption of the Opinion: TBD depending on European Commission 's schedule (likely Q2 or Q3 2026)
Deliverable 2: External workshop
Public consultation: No
Publication: Yes
Timing: TBD

1.5.   **External Workshop on migration and copper switch-off in light of the DNA**

Migration to VHCN and copper switch-off has been a strong focus of BEREC in recent years and is an ongoing and accelerating process. While some Member States have already (almost) completed the migration of customers to VHCN, others are still in the early stages of the process.

How to manage switch-off and migration from copper to fibre networks will be key for Europe to achieve its 2030 connectivity targets. Following on from the BEREC Progress Report on managing copper switch-off (BoR (25) 66), which was published in June 2025, BEREC will continue to work on this subject, to ensure competitive dynamics are maintained during the switch-off and migration processes.

The main message from stakeholders in response to the BEREC progress report on migration and copper switch-off was that BEREC should draw more lessons learned and offer further guidance on the process. The workshop can be an opportunity for NRAs to share best practices and for stakeholders to present their view on how the process should be organised, in their view.

Moreover, under the EECC, migration and copper switch-off adheres to the stipulations of Article 81 of the EECC.

The workshop may also function as an opportunity for discussing potential improvements to the current legislative and regulatory approaches.

Deliverable: External Workshop
Public consultation: No
External workshop to be held in Q2 2026 (indicative)
Adoption of the workshop summary report at Plenary 2, 2026 for publication (indicative)

1.6.   **BEREC Report on the application of fair and reasonable pricing within the SMP framework**

The Staff Working Document accompanying the Gigabit Recommendation highlights the possibility of fair and reasonable pricing in scenarios where strict quantitative price controls are not required. This type of pricing regulation is particularly relevant when some level of pricing flexibility has been granted to operators but the NRA should still retain the ability to intervene if prices are deemed inappropriate or excessive.

Fair and reasonable pricing is also the main form of price regulation permitted for wholesale-only operators. However, there is very limited guidance on how this obligation should be interpreted within the SMP framework. As a result, different NRAs have adopted varying approaches to implementing and monitoring these obligations.

This BEREC report shall present an in-depth review of the interpretations and applications of fair and reasonable pricing obligations within the SMP framework across Europe.

The scope will include an overview of NRA approaches, providing a comprehensive description of the context in which NRAs use fair and reasonable pricing obligations (i.e. in which markets and circumstances), including their reasoning and motivations, and how they implement and monitor those obligations. If possible, BEREC will also identify potential patterns, highlighting trends and/or specific approaches adapted to particular market contexts.

Comparisons with other frameworks could also be included in order to explore potential differences of how fair and reasonable pricing is interpreted in other regulatory contexts, such as under the provisions of GIA/BCRD.

The main findings of BEREC will be available by the end of 2026 for public consultation period which will follow

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Deliverable: Report
Public consultation: Yes
Adoption of the draft report for public consultation at Plenary 4 2026
Adoption of the final report at Plenary 2 2027
Adoption of the outcome of the consultation Summary Report at
Plenary 2 2027
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1.7. BEREC Report on access conditions to state-aid funded networks

In recent years, state-aid-funded FTTB/H networks have been rolled out in most EU Member States. These networks have to offer wholesale access at certain terms and conditions, which are of significant importance for the development of competitiveness in these areas going forward.

According to the Broadband State Aid Guidelines, "Member States must consult NRAs on wholesale access products, conditions and pricing. NRAs are encouraged to provide guidance […]". It can therefore be assumed that several NRAs have gained experience in determining access conditions to state-aid-funded networks, including on specifics related to economical and technical feasibility.

BEREC is planning to develop an overview of NRA approaches undertaken for the evaluation of the appropriate wholesale access conditions to fixed state-aid-funded networks from an economical and technical perspective, accompanied by details on price determination. The focus will be on both active and passive access services.

BEREC's report will build on a dedicated data collection exercise from the NRAs and will promote experience exchange, with the aim of contributing to dissemination and harmonisation of practices.

Deliverable: Report
Public consultation: Yes
Adoption of the draft report for public consultation at Plenary 3, 2026
Adoption of the outcome of the consultation Summary Report for publication at Plenary 1, 2027
Adoption of the final report for publication at Plenary 1, 2027,

1.8. BEREC contribution to European Commission Guidelines on Access to existing physical infrastructure according to Art. 3 (13) of the Gigabit Infrastructure Act

The GIA aims at facilitating and stimulating the roll-out of VHCNs so that such networks can be rolled out faster and at a lower cost. In order to achieve that, the GIA, for example, sets rules for access to existing physical infrastructure. According to Article 3 (1), network operators and public sector bodies owning or controlling physical infrastructure shall meet, upon written request of an operator, all reasonable requests for access to that physical infrastructure under fair and reasonable terms and conditions, including price, with a view to deploying elements of VHCNs or associated facilities. Article 3 (13) stipulates that the European Commission, in close cooperation with BEREC, may provide guidance on the application of Article 3 GIA.

The European Commission launched a call for stakeholder input based on a questionnaire in summer 2025.

Subsequently, BEREC will closely cooperate with the European Commission on the development of Guidelines. The timing and scope of BEREC's work will depend on the Commission's needs, to a significant extent.

Deliverable: TBD (depending on European Commission needs)
Timing: TBD (depending on European Commission needs)

1.9. 32nd BEREC International Roaming Benchmark and Transparency Report incl. annex for WB

According to the Roaming Regulation, BEREC shall collect data regularly from NRAs regarding the implementation of the Roaming Regulation. Data to be collected by BEREC are to be notified to the European Commission once a year. On the basis of data collected, BEREC also has to regularly report on the evolution of pricing and consumption patterns in the Member States, both for domestic and roaming services, the evolution of actual wholesale roaming rates for balanced and unbalanced traffic and the relationship between retail prices, and wholesale charges and costs for roaming services. BEREC will assess how closely those elements relate to one other.

The Roaming Regulation mandates the production of one BEREC report including the information that was previously reported by the two BEREC roaming benchmark data reports and the BEREC transparency and comparability report, as well as additional indicators.

The data collection for the 32nd Report was launched at the end of September 2025. The data shall be submitted by NRAs to the BEREC Office by mid-November. After analysing the data, the report will be drafted and will be adopted in Plenary 1, 2026.

The BEREC Roaming Data Report will include an Annex reporting on the evolution of roaming prices and volumes for the Western Balkan region.

> **Deliverable:** 32nd BEREC international Roaming Benchmark Data Report
> Public consultation: No
> Adoption of the final report at Plenary 1, 2026, for publication

1.10.   7th Intra-EU communications Benchmark Report

According to Article 5a (6) of the TSM Regulation as amended by the BEREC Regulation, NRAs should monitor the price developments of regulated intra-EU communications services. For this purpose, BEREC provides a template to contribute to harmonised data collection in the EU/EEA. NRAs collect data from both fixed and mobile operators on a yearly basis and submit the data to BEREC.

In 2026, BEREC is planning to publish the 7th Benchmark Report on the findings of the data collection. BEREC will update the data collection questionnaire in order to take into account the latest legislative provisions and will launch the data collection for this report in March with a deadline for NRAs to forward the data to the BEREC office in mid-May. After analysing the data, a report will be drafted, to be adopted and published in Plenary 3, 2026. Using collected data, BEREC will also publish an annex to the report, along with the updated BEREC benchmarking for the derogation assessments

> **Deliverable:** 7th Intra-EU communications Benchmark Report
> Public consultation: No
> Adoption of the final report at Plenary 3, 2026, for publication

1.11.   Ad hoc work to support information exchange on 5G private networks, direct-to-device satellite communication, phaseout of 2G and 3G mobile technologies, and hybrid networks

Throughout 2025, BEREC carefully considered many mobile network evolution related topics, including reporting on 5G private networks and the interrelation with public networks in Europe, and conducted two internal workshops dedicated to direct-to-device satellite communications, and on the phaseout of 2G and 3G mobile technologies.

BEREC plans to continue to support capacity building through expert dialogue on these topics during 2026, including undertaking ad hoc work to support relevant information exchanges and strengthen BEREC's technical capabilities.

In particular, BEREC is open to the possibility of inviting external presenters and initiating internal discussions on some or all of these topics, especially in the context of developments in hybrid or heterogenous networks, in which interworking and interrelations between different types of satellite, mobile and RLAN networks are also of growing interest.

Among these topics, the following are currently particularly relevant for regulators:

— The potential competition and cooperation dynamics between terrestrial and satellite network operators, and market shaping aspects of relevant spectrum assignment processes in view of exploring potential common European conditions for the provision of direct-to-device mobile services in the spectrum bands for terrestrial service;

— The interplay between RLAN and mobile networks in the context of enhancing indoor coverage, notably with respect to terminal equipment, competition and collaboration issues;

— How hybrid networking will change dynamics of aspects such as coverage, roaming, (wholesale) access and legal interception

Deliverable: Various
Timing: throughout 2026

1.12. Update to BEREC Guidelines on Geographical surveys of network deployments

In the years 2020 and 2021, BEREC published three 'Guidelines on Geographical surveys' based on Article 22 of the EECC on the mapping of broadband network deployments. These Guidelines on Geographical surveys are (a) core guidelines (BoR (20) 42), (b) procedural guidelines (BoR (21) 32) and (c) verification guidelines (BoR (21) 82). These three BEREC Guidelines are also published and compiled in the Handbook of BEREC Guidelines on Geographical surveys of network deployments (BoR (21) 104).

In its core guidelines (chapter 1.5), BEREC committed itself to prepare an Implementation Report "to examine how different Member States have transposed and enabled the Article 22 provisions". BEREC carried out the Implementation Report BEREC in 2024 and evaluated whether to revise and update the Guidelines (BoR (20) 42). Arising from the Implementation Report, BEREC considers that it is appropriate to propose certain revisions and updates of the Guidelines.

Deliverable: Update to Guidelines
Public consultation: Yes
Adoption of the draft updated guidelines for public consultation at
Plenary 4, 2025
Adoption of updated guidelines for publication at Plenary 2, 2026
Adoption of the outcome of the consultation Summary Report for
publication at Plenary 2, 2026

2. Strategic priority: Supporting competition-driven and open digital ecosystems

Open and competitive markets are fundamental drivers of innovation, investment and end-user welfare. Sector-specific regulation in monopolistic electronic communications markets have transformed into more competitive markets, allowing for consumer choice and incentivising investment in cutting-edge networks and innovative services. BEREC will leverage its expertise and analysis to support competition and openness in digital ecosystems.

On the one hand, ex ante market regulation on ECN/S continues to provide targeted and flexible regulation by means of imposing tailored and proportionate remedies for problems identified. BEREC will continue to offer its expertise in terms of assessing markets, facilitating deregulation where competition is effective, while prioritising measures to stimulate competition and efficient investment in less competitive regions, particularly rural and underserved areas. Considering potential market developments leading to consolidation and the emergence of tight oligopolies, BEREC will assess regulatory approaches in order to address issues in such market structures. BEREC will also consider the consequences of market developments such as consolidation, vertical separations or assets divestment including the assessment of their impact on end-users, the value chain and investment incentives, as well as the role of emerging new players or providers in adjacent markets. On the other hand, ECN/S provision cannot be considered separately from the digital services and infrastructures (e.g. IP interconnection, data processing services, AI, CDNs or social networks, etc.), which encompass the internet ecosystem.

BEREC contributes actively to the development and implementation of the DMA, being part of the DMA High Level Group and cooperating closely with the European Commission in the implementation of interoperability obligations imposed on NI-ICS providers designated as gatekeeper. Drawing on its experience in ECN/S, BEREC will continue monitoring developments in digital markets and contribute to the implementation of digital regulations (particularly the DA and the DMA) and their evolution, including the upcoming DMA review in 2026.

Additionally, BEREC will continue to closely follow developments in the field of AI. With a view to simplification, BEREC will be committed to provide advice for fostering the alignment of forthcoming digital frameworks, namely the DNA and the Cloud and AI Development Act, with existing regulations such as the DA or the DMA. BEREC will therefore work towards the compatibility of the definitions and scope of these different texts so as to enhance legal certainty and reduce compliance targets for the ECN/S stakeholders

2.1.   BEREC contribution to the implementation of the Data Act

The Data Act entered into force in September 2025. BEREC has provided its expertise in the context of the Data Act by producing a variety of deliverables such as the High-Level Opinion on the European Commission's proposal for a Data Act (BoR (22) 54), a workshop on switching and interoperability of data processing services, a workshop on IoT, both held in 2023, a report on cloud services and edge computing (BoR (24) 136), and an external study on the trends and policy/regulatory challenges of cloudification, virtualisation and softwarisation in telecommunications (BoR (23) 208). Moreover, BEREC also actively contributes to the implementation of the DMA – including as a member of the DMA High-Level Group and of its subgroups – and this regulation also includes provisions concerning data access, vertical and horizontal interoperability. Some obligations under the DMA can also apply to cloud services.

In the Data Act, independent national competent authorities with experience in electronic communications services are considered to be well-placed to ensure the application and enforcement of specific provisions. Some BEREC members have already been designated as the national competent authority responsible for the application and enforcement of (certain chapters of) the Data Act, and more members are likely to be designated soon.

BEREC's contribution would be particularly relevant, for instance, in relation to switching between data processing services (such as cloud and edge services), the monitoring of switching charges, interoperability, or complaints handling, IoT and more generally concerning the impact of such services and the Data Act obligations on the telecommunications sector. The contribution could take different forms (i.e. meetings with stakeholders, opinions, workshops, knowledge-building, exchange of best practices, report, etc.) and will be adapted to the legislative timing and process. BEREC's insights could also be valuable for the preparation of the implementing and delegated acts that the European Commission is required to adopt under this regulation.

Deliverable: Contribution to the implementation of the Data Act (TBD, e.g. opinions, workshops, knowledge-building, reports, etc.)
Timing: throughout the year

2.2.   Further Guidance on 5G Network Slicing

BEREC observes that, in the public discourse, certain stakeholders have called for greater certainty concerning the provision of innovative services based on network slicing. BEREC reiterates that network slicing is compatible with the OIR. Network slicing can be used to deliver both internet access services (IASs) with different levels of Quality of Service (QoS) and specialised services (SpSs).

BEREC will proactively engage with stakeholders and explore options so as to provide further clarity, as requested, regarding whether network slicing is compatible with the OIR. To this end, BEREC will launch a call for input from stakeholders that will inform additional guidance on this specific issue. This guidance is intended to be reflected in thematic guidelines that will make reference to the general OIR Guidelines. To ensure flexibility, the actual format of these guidelines (e.g. ad hoc document, amendment or annex to the OIR Guidelines) will be discussed as the work progresses. The draft guidelines will be submitted for public consultation.

The work will have limited scope and will address to what extent network slicing falls within the scope of OIR and how NRAs should assess network slice implementations. It will also address how the Article 3(5) assessment regarding Specialised Services (SpS) could be further clarified. These two topics are connected but it must be noted that network slicing does not require optimisation, and that optimisation can be done without network slicing. Therefore these can be considered complementary approaches for providing the clarity, as requested.

Deliverable: Guidelines
Public consultation: Yes
Adoption of the draft guidelines for public consultation: Plenary 2,
2026
Adoption of the final guidelines at Plenary 4, 2026
Adoption of the outcome of the consultation Summary Report at
Plenary 4, 2026

2.3. BEREC contribution to the implementation of the Digital Markets Act

BEREC has been playing an active role in assisting the European Commission in the implementation of the Digital Markets Act (DMA).

Article 7 of the DMA includes interoperability obligations for NI-ICS and the Regulation provides in particular for a close cooperation between the European Commission and BEREC for the enforcement of this provision. Against this backdrop, since early 2024, the European Commission has been requesting of BEREC to determine whether the technical details and the general terms and conditions published in the gatekeeper's reference offer are in compliance with the interoperability obligation. BEREC has already delivered three opinions on the matter[5].

BEREC is also a member of the DMA High-Level Group (HLG). The role of the HLG is to provide the European Commission with advice and expertise on any general matter of implementation or enforcement of the DMA, and the promotion of a consistent regulatory approach across different regulatory instruments. It may also provide expertise to the European Commission on the need to amend, add or remove DMA rules so as to ensure that digital markets across the Union are contestable and fair. BEREC experts are also contributing to the three HLG subgroups dedicated to data, interoperability and artificial intelligence.

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[5]   https://www.berec.europa.eu/en/all-topics/ni-ics-interoperability

Moreover, BEREC is contributing to discussions around the review of the DMA. Indeed, according to Article 53, the European Commission shall evaluate the DMA by 3 May 2026 and assess: i) whether the aims of this regulation (ensuring contestable and fair digital markets) have been achieved, and; ii) its impact on business users, especially SMEs, and end users. Moreover, the European Commission shall evaluate whether the scope of Article 7 may be extended to include online social networking services, and whether it is required to modify rules, including regarding the list of core platform services, the obligations laid down in Articles 5, 6 and 7 DMA and their enforcement. BEREC responded to the European Commission's consultation on the matter (BoR (25) 119), and is actively contributing to discussions within the HLG.

More generally, BEREC will continue monitoring and analysing developments in the digital markets area, and the impact and effects of the practices implemented by large online platforms. Special attention will be paid to practices which may not be addressed under current legislation.

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Deliverable: Contribution to the implementation of the Digital Markets Act and to its review (TBD, e.g. HLG meetings, opinions, reports, workshops, knowledge-building, etc.)
Timing: Throughout 2026

2.4. BEREC report on the competition dynamics of artificial intelligence and its impact on internet openness and end-users

Artificial intelligence (AI) is increasingly becoming a relevant component of the (digital) economy.

BEREC has already produced several deliverables on AI and related topics in the last years, such as its BEREC High-level position on artificial intelligence and virtual worlds (BoR (24) 68), the BEREC Report on the impact of AI solutions in the telecommunications sector (BoR (23) 93), the BEREC Report on Cloud and Edge Computing Services (BoR (24) 136), and the BEREC external study on the trends and cloudification, virtualisation, and softwarisation in telecommunications (BoR (23) 208).

As highlighted in BEREC High-level position, AI has the potential to enrich user experience and complement traditional methods of accessing online content and services. However, AI can also affect the overall user experience on the internet as it has the potential to directly influence how users access and trust online content/services and consequently, their freedom of choice.

BEREC will produce a report to further analyse (i) the competition dynamics of AI markets (potentially including providers of related services when relevant). In this context, the report may also consider how algorithmic prioritisation can skew competitive dynamics; and (ii) the impact on internet openness – which can be defined as the ability of users to access and distribute information and content online, without unlawful interference or discrimination, as well as their ability to innovate. This can typically happen when AI defines the information and content which is suggested to users.

Deliverable: Report on the competition dynamics of artificial
intelligence and its impact on internet openness and end-users
Public consultation: Yes
Adoption of draft report at Plenary 3 2026 (for public consultation)
Adoption of the final report at Plenary 1 2027
Adoption of the outcome of the consultation Summary Report at
Plenary 1 2027

2.5.   BEREC external workshop on implementation of Equivalence of Inputs (EoI) by NRAs

BEREC's plans to look closer at the issue of EoI implementation in the relevant
markets from next year. Due to the new scope of the Gigabit Access Recommen-
dation and the increased reliance on non-discrimination obligations imposed on
SMP-operators, the issue of Equivalence of Inputs gains on relevance to ensure
competition by alternative operators. In order to hear the different views BEREC
will organize an external workshop with the relevant stakeholders. In the work-
shop BEREC will also ask for views regarding the relationship of EoI and EoO in
practice.

Deliverable: BEREC external Workshop & Summary Report
Public consultation: No
External workshop to be held in Q3 2026
Adoption of the workshop summary report at Plenary 4, 2026, for
publication

3.   Strategic priority: Empowering end-users

BEREC remains committed to high and consistent levels of end-user protection, technological neutrality, and cooperation with EU institutions, NRAs and industry, as markets evolve, while ensuring transparent, competitive and innovation-friendly conditions and safeguarding equivalent access across technologies.

BEREC will continue considering market and technical developments from an end-user perspective so as to ensure transparency and enable end-users to make informed decisions.

In a rapidly evolving environment it is essential for keeping end-user rights up to date, adapting obligations and contract terms in order to remain relevant, given the ever-changing nature of the services in question and providers' business models.

BEREC will continue providing a structured framework for the consistent implementation of the Open Internet Regulation (OIR) in line with the BEREC Open Internet Guidelines focusing particularly on new differentiated services and quality of services (QoS), network slicing, transparency obligations, traffic management practices or specialised services.

Particular emphasis will be placed on digital exclusion. BEREC will assess potential new contributing factors to the digital divide which may emerge with the advent of both new technologies and other elements of the electronic communications ecosystems. Promoting accessibility for all end-users will remain at the forefront of BEREC's efforts to achieve the highest level of protection and digital inclusion.

The process for phasing out legacy networks and services will have to be closely monitored so as to prevent negative impacts. It is important to maintain the current standards of end-user protection, as well as a level playing field for functionally equivalent services.

BEREC will also continue striving to enhance end-user trust and safety in electronic communication services.

BEREC continues to remain abreast of following AI-related developments and strives to harness its experience and expertise in the sector in order to ensure that end-users benefit from the advantages of AI, while also minimising the risks it may pose.

3.1.   BEREC report on switching and termination of contracts

This project builds on the work done by BEREC in 2018 resulting in a report in which information from NRAs on the varying approaches to switching across different communications services was collated (BoR (19) 27). In November 2022, a joint workshop between BEREC and BEUC was held, as part of which, among other things, the switching process – including the procedure for terminating the contract with the existing operator – was discussed. A transparent and secure switching process contributes to market competition and the strengthening the right of end users in choosing the services that best suit their wishes and needs at a given moment. Various challenges in this procedure were identified, especially with regard to service interruption, compensation for delays, and loss of service, together with problems related to switching in the case of bundled services. BEREC believes that, in the context of findings outlined in BEREC Opinion on the

market and technological developments and on their impact on the application of rights of end users in the EECC (BoR (24) 180) – which was adopted in December 2024 – it would be worthwhile to identify the problems that still persist among the Member States, bearing in mind the provisions of the EECC which will be in force for a longer period, as well as the best solutions implemented among Member States.

The report will focus on the national implementation of the measures provided for by Article 106 of the EECC and, among other things, will cover issues related to the details and the timing of the switching and porting processes, porting failures and switching processes in the case of bundles.

Deliverable: BEREC report on switching and termination of contracts
Public consultation: Yes
Adoption of the draft report for public consultation at Plenary 4, 2025
Adoption of the final report at Plenary 2, 2026 for publication
Adoption of the outcome of the consultation Summary Report at Plenary 2, 2026 for publication

3.2. BEREC-BEUC Joint workshop on end-user rights

The BEREC-BEUC joint workshop will be an opportunity for bringing together regulatory bodies and civil society organisations, especially consumer organisations, in order to discuss all factors which could potentially impact European consumers in a rapidly developing digital environment. The potential effects of relevant aspects such as quality of service, coverage, information and marketing practices will be covered as part of the workshop. By engaging in this comprehensive discussion, the workshop seeks to identify actionable insights and policy recommendations or legislative changes, especially taking into account the BEREC Opinion on Article 123 and the European Commission views on the review of Title III of Part III on end-user rights, which can empower consumers and strengthen their position in the digital marketplace.

Deliverable: External Workshop & Summary Report
Public consultation: No
External workshop to be held in Q4 2025
Adoption of the workshop summary report at Plenary 1, 2026

3.3.   Workshop and Report on practices for ensuring equivalence of access and choice with respect to accessibility

The aim of the European Accessibility Act (EAA) is to harmonise accessibility requirements for products and services by eliminating and preventing barriers to the free movement of certain accessible products and services, arising from divergent accessibility requirements and different stages of preparatory activities in Member States. Although the BEREC workshop on end-user rights[6] held in April 2024 proved to be a valuable forum for sharing views and concerns related to accessibility (with one session being dedicated to this topic), the further focus of BEREC on the matter is crucial in order to prepare for the implementation of the requirements stemming from the EAA. This workshop would serve as an initial step to the report.

The report would build on the work done by BEREC in 2015, 2017 and, most recently, in 2022, resulting in the BEREC Report on measures on equivalent access and choice for disabled end-users, in which information from NRAs was collated with the aim of creating an inventory of measures and initiatives for NRAs to have in place so as to ensure equivalence of access.

In this benchmarking report, the measures in place throughout the Member States for meeting the accessibility requirements established in the EECC and in the EAA, which come into force on 28 June 2025, would be identified.

In order to ensure that a strategic view of the measures taken is presented in the report, in addition to seeking information from NRAs, BEREC may also seek input from key stakeholders regarding any measures provided independently from those prescribed by the NRAs under other relevant consumer legislation. The role of NRAs in ensuring accessibility requirements in electronic communications would also be outlined.

Deliverable 1: Workshop
Public consultation: No
External workshop to be held in Q2 2026
Adoption of the workshop summary report at Plenary 3, 2026
Deliverable 2: Report
Public consultation: Yes
Adoption of draft report for public consultation at Plenary 4, 2026
Adoption of the final report at Plenary 2, 2027
Adoption of the outcome of the consultation Summary Report at Plenary 2, 2027

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[6]   https://www.berec.europa.eu/en/events/berec-workshop-on-end-users-rights

3.4. | Implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines

The Open Internet (OI) Regulation (EU) 2015/2120 prescribes that NRAs should 'closely monitor and ensure compliance' with the Regulation and should 'publish reports on an annual basis regarding their monitoring and findings'.

Since 2017, BEREC has annually published a Report on the implementation of the OI Regulation and the OI WG has provided an internal forum to discuss national cases and questions in order to ensure a predictable and consistent application of the OI Regulation.

In 2026, BEREC will monitor the implementation of the OI provisions among NRAs for the period from 1 May 2025 to 30 April 2026. BEREC will gather the annual national OI Reports and answers provided in an internal questionnaire when preparing the annual European-level OI Report.

In order to support the NRAs' obligation to 'closely monitor and ensure compliance' with the OI Regulation, a forum will be held to discuss, on an informal basis, questions relating to the consistent application of the OI Regulation. The sharing of experience and exchange of important decisions in national cases is essential for fostering consistent application of the OI Regulation throughout Europe in light of evolving markets and technologies. In addition to discussing the national cases, the forum covers the sharing of information on relevant market developments.

Where appropriate, the workstream may also include questionnaires, surveys, workshops, etc. with the aim of collecting information on topics of particular relevance to the OI and monitoring emerging trends as the market continues to develop, and contributing to the work of other Working Groups related to internet evolution. Such a workstream should build on experience garnered from previous exercises.

> **Deliverable:** Report on the implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines
> Public consultation: No
> Adoption of final report at Plenary 3, 2026

3.5. | Collaboration on internet access service measurement tools

In 2022, BEREC published an update of the BEREC Net Neutrality Regulatory Assessment Methodology (BoR (22) 72), originally released in 2017. Together with the Net Neutrality Measurement Tool Specification (BoR (17) 179), the groundwork for BEREC to work towards a harmonised measurement framework is laid down in both documents. This goal remains important, and related work has continued. The Open Internet Working Group has provided a forum for collaboration between NRAs to share information and exchange experiences and best practices on national tool deployment.

Through this workstream, BEREC intends to ensure that the work that is currently ongoing with NRAs on their national measurement tool deployment will continue, so as to:

— provide a forum for NRAs to share information and exchange experiences and best practices related to the development and deployment of national measurement tools by taking into account the support of new technologies; best practices for collaboration will be identified as part of this workstream so as to maximise the benefits of existing NRA cooperation in this area; and;

— support the migration of interested NRAs towards a harmonised measurement tool by working together in order to improve measurements, and by sharing codes or components between NRAs.

Deliverable: none
Timing: throughout the year

3.6. | Assessment of the need to review BEREC Guidelines for QoS parameters according to Art. 104 EECC

In 2020, BEREC first published its Guidelines detailing QoS parameters (BoR (20) 53). The Guidelines state that the process of undertaking a review of the guidelines will commence 2 years from the adoption and publication of the Guidelines by BEREC. Subsequent reviews will be determined by BEREC and will be agreed and set out in future BEREC work programmes.

In 2026, BEREC will assess the need to revise the guidelines and proceed based on that assessment.

Deliverable: internal assessment
Timing: Plenary 4, 2026

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

BEREC will focus on the environmental sustainability, security and resilience of ECN/ECS as strategic horizontal considerations for the existing objectives of the EECC. BEREC will work to support the development of a secure, resilient and environmentally sustainable electronic communications ecosystem where ensuring continuity of communications services requires coordinated strategic, operational and technical measures along with their harmonised implementation.

BEREC considers that resilient communication networks are essential for the functioning of both society and the economy, particularly during crises. This applies to both physical (terrestrial and NTN) and virtual networks.

Cybersecurity and resilience

In the context of evolving geopolitical dynamics and in light of natural disasters increasingly driven by climate change, cybersecurity, networks and essential services resilience and reinforcing EU technological sovereignty by improving EU's digital self-sustainability have become matters of utmost importance for safeguarding communications and data across the EU. These aspects are more critical than ever, both for current networks and for those of the future.

The new security obligations introduced under the NIS2 and CER Directives constitute significant instruments for addressing challenges related to security and resilience. However, they also have a considerable impact on operators' costs, market competition and, ultimately, on consumer pricing. BEREC, the NIS Cooperation Group, and ENISA are engaged in ongoing exchanges aimed at sharing insights and supporting effective compliance.

BEREC acknowledges that cybersecurity and resilience in the context of ECN/ECS is a highly multifaceted issue. Risks arise not only at the software level but also in relation to hardware and physical infrastructure, all of which must be duly considered.

BEREC considers that ensuring service continuity requires the implementation of strategic, operational and technical measures for mitigating risk. Telecommunications infrastructure must be designed with resilience in mind, and must also be capable of addressing a wide range of threats and vulnerabilities. In this regard, BEREC can serve as a valuable forum for NRAs to exchange views, share experiences on national resilience strategies, and disseminate best practices.

In particular, BEREC will focus on enhancing the resilience of networks against hybrid threats, including those that target or exploit the supply chain. Through its work in this area, BEREC underscores the importance of ongoing improvements in crisis management, legislative frameworks and energy resilience.

Environmental Sustainability

Advancing environmental sustainability generally represents a crucial societal priority and is of critical importance for the long-term viability of network deployments. BEREC's work, will reflect a comprehensive approach to sustainability considering technological and regulatory advancements in relation to the broader digital infrastructures, such as data centres. BEREC also highlights that digital technologies are key elements in responding to the climate challenge and achieving international and European environmental goals including the Paris Agreement and the European Green Deal. In that respect, connectivity would be a critical enabler for the decarbonisation of other sectors including energy, transportation and agriculture.

Environmental sustainability in relation to ECN/ECS can be viewed as two distinct yet interrelated areas, i.e. mitigation and adaptation.

While BEREC acknowledges the environmental sustainability opportunities brought about by new and emerging technologies and services, it is also aware of the environmental footprint of such technologies and services. BEREC will investigate the main factors of the digital environmental footprint, identifying a robust yet relevant and efficient set of widely endorsed, science-based indicators and harmonised methodologies. BEREC remains committed to contributing to work on sustainability indicators in the context of the EU Code of Conduct for the sustainability of telecommunications networks, in order to enable data-driven decision-making, which is aligned with any advancements in the regulatory framework.

4.1. Advancing towards environmental data collection on ECN/ECS and contributing to future code of conduct on ECN/ECS sustainability

Since 2020, BEREC has built substantial expertise, especially with regard to transparency mechanisms and sustainability indicators. Building on its 2023 Report on Sustainability indicators for ECN/ECSs, and its 2024 workshop on telecoms regulators' role in this regard and the European Commission's study on 'identifying common indicators for measuring the environmental footprint of electronic communications networks', BEREC continued its work on sustainability indicators in 2025 and will also continue in 2026. In particular, BEREC will contribute to and support the work of the European Commission on the future Code of Conduct for ECN/ECSs, expected to be delivered by the end of 2025. It will establish the ground for BEREC ad hoc data collection through a questionnaire on the implementation of key sustainability indicators, which NRAs will be invited to distribute to their market players. It will also help to establish the ground for further assessments of the environmental footprint of the ICT sector as key input for data-driven regulatory decision-making. It will closely follow further developments with regard to the EU Taxonomy in terms of green investments in telecommunication networks, as well as the Omnibus Package proposals for simplifying sustainability reporting. It will also take into account the work led by ITU and, specifically, the work of the Expert Group on Telecommunications/ICT Indicators (EGTI).

On the basis of the Code of Conduct for ECN/ECS, BEREC will assess any further action it may take. Market operators may need further guidance in order to be able to implement the Code of Conduct, especially with regard to the expected practices. BEREC will maintain dialogue with market participants about their experiences of implementing the Code of Conduct.

Deliverable 1: Questionnaire
Public Consultation: No
Questionnaire to be distributed in Q4 2026
Deliverable 2: Report
Public Consultation: Yes
Adoption of draft report for public consultation at Plenary 4, 2027
Adoption of the final report at Plenary 2, 2028
Adoption of the outcome of the public consultation report at
Plenary 2, 2028

4.2. Sustainable AI for greener digital infrastructures: Understanding the environmental implications of AI in the telecoms and ICT sector

This project is intended as a follow-up on the item 'BEREC internal report on the integration of AI in the telecommunications sector', with a specific deliverable report titled 'The impact of AI on internet openness & the environment'. The project is set to commence in Q4 2025[7], and on BEREC's High-Level Position on Artificial Intelligence and Virtual Worlds (BoR (24) 68). In addition to that, BEREC has organised an external workshop on the ecodesign of digital services, including sessions focusing on the environmental footprint of AI. In this position, while acknowledging the environmental sustainability opportunities brought by AI, BEREC recognises the importance of taking into account the environmental footprint of AI, including electricity consumption, when considering its integration in the telecoms sector and, more largely, for greener ICT/digital infrastructures.

The objective of this project is to gather factual information on the environmental footprint of AI in relation to electronic communications networks and services (ECN/ECS) and ICT. The report will:

— establish a 'state of the art' regarding to the environmental footprint of AI;

— assess potential efficiency gains and other indirect effects linked to AI deployment, notably for ECN/ECS;

— map the supporting infrastructures required for AI computation relevant to ECN/ECS (e.g. data centres, edge computing, network functions);

— present the environmental indicators recommended by standardisation bodies in relation to AI, and;

— highlight potential levers within BEREC's remit in terms of encouraging the implementation of sustainable AI with the aim of moving towards greener digital infrastructures.

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[7]   https://www.berec.europa.eu/system/files/2025-01/BEREC%20Work%20Programme%20
2025%20%28Design%20version%29.pdf, page 30.

Deliverable: Report
Public consultation: Yes
Adoption of draft report for public consultation at Plenary 4, 2026
Adoption of the final report at Plenary 1, 2027
Adoption of the outcome of the public consultation report at Plenary 1, 2027

4.3. Understanding digital technologies sufficiency for greener networks and ICTs

'Digital technologies are energy and resource intensive with their total electricity demand (production and use) accounting for 8-10% of worldwide electricity consumption'[8]. While the efficiency of ICT devices and systems is improving, the gains in efficiency are often offset by increased use. Digital sufficiency also involves optimising software to reduce data traffic and minimise hardware usage. User sufficiency is also important because it promotes a more frugal approach to using digital technology. A call for digital sufficiency strategies and policies has been made in response, promoting the design of longer lasting services and the control of complexity and resource use. Such strategies aim at producing fewer devices while ensuring their lowest possible energy consumption.

Following on from the key insights identified as part of the 2025 workshop on the eco-design of digital services, specific focus could be given to areas such as device longevity, data minimisation, the eco-design of digital services and the balance between connectivity and sustainability. The discussion could also focus on regulatory frameworks including incentive-based solutions and industry initiatives that promote sufficiency-oriented digital policies and business models. In this context, the workshop could explore how telecoms operators, cloud providers, device manufacturers and standardisation bodies can collaborate with the aim of aligning around shared sufficiency goals.

Lastly, economic sufficiency can also be considered an aspect of digital sufficiency as, through this lens, digitalisation can be viewed as supporting the transition to production and consumption, two elements that remain within achievable boundaries and avoid unbound growth.

Deliverable: Workshop
Public consultation: No
External workshop to be held in Q3 2026
Adoption of the workshop summary report at Plenary 4, 2026

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[8]   Source: EU Commission's **Competence Centre on Foresight**.

4.4.   Ad hoc work to support reinforcing EU's cybersecurity capabilities

In the past, BEREC has worked closely with the NIS Cooperation Group and the European Commission in developing and implementing the recommendation of the EU Toolbox for Cybersecurity of 5G Networks. In the Nevers Call of 9 March 2022, BEREC was addressed together with ENISA and the NIS Cooperation Group, along with the European Commission, to formulate recommendations, based on a risk assessment, to Member States and the European Commission in order to reinforce communications networks and infrastructural resilience within the EU, including the implementation of the 5G toolbox.

On 21 February 2024, the NIS Cooperation Group published a report titled 'Follow-up to the Nevers Call of 9 March 2022' with a number of strategic and technical recommendations for Member States, the European Commission, ENISA and BEREC aimed at mitigating the risks that have been identified in the assessment performed at an earlier stage, between April 2022 and December 2023, by Member States in the NIS Cooperation Group along with support from the Commission and ENISA, and in consultation with BEREC. The NIS Cooperation Group, ENISA, the ECASEC Expert Group and BEREC have drafted an Action Plan to implement the recommendations of the Nevers report, which currently constitutes a living document shared among the mentioned parties.

In 2026, BEREC plans to continue to collaborate closely with the NIS Cooperation Group as well as with ENISA and the European Commission on topics related to the cybersecurity and resilience of communications networks as foreseen in the Follow-up to the Nevers Call report in order to develop recommendations and, potentially, other guidelines. This includes participation at the joint meetings as well as workshops and conferences co-organised by these institutions.

BEREC will cooperate and follow closely ENISA and Member States on their work related to the Nevers recommendations, in particular, and other cybersecurity initiatives of EU bodies (e.g. Warsaw call on cybersecurity challenges). It will provide its support in enhancing cooperation and information exchange (e.g. by collecting relevant data from the market players where needed), and strive for harmonised and innovation friendly implementation of the cybersecurity legislation (e.g. by co organising workshops and giving expert opinions and comments and enhancing best practice sharing among the NRAs).

Deliverables: BEREC contribution to support reinforcing EU's cybersecurity capabilities and resilience of networks (to be defined, e.g. data collection, anonymisation and analysis of data from the market players, workshops/meetings, opinions, papers, report)
Timing: throughout 2026

4.5. | Reinforcing EU's Resilience Capabilities

The security and resilience of electronic communication networks and services is of paramount importance to the well-functioning Digital Single Market. The single market needs clear legal frameworks so that only one set of rules applies for a given matter. There must be a clear distinction between which obligations are imposed on operators, under which legal framework, and which authority is responsible for enforcement. In some countries, solutions whereby the NIS authority takes on horizontal responsibility for security across all sectors covered by the NIS framework have occurred, while sector-specific mandates remain within the competence of sector regulators (NRAs) with a long-standing role and proven experience in particular sector. Given that telecoms regulators (NRAs) possess specific knowledge about technology and market developments in the sector, their continued involvement in issues related to security and resilience must be ensured. Different models may be used across the EU but the essential involvement of NRAs should be guaranteed. BEREC will explore the potential role of NRAs with respect to the resilience of electronic communications networks. Depending on the results from work carried out in 2025, the following tasks could be performed in 2026:

— Map the NRAs competences and tasks related to resilience;

— Share policy examples and best practices on resilience;

— Facilitate stakeholders dialogue;

— Produce a report with best practices;

— Provide any input or feedbacks to EC and/or other legislators in case of a new legislative proposal on network resilience;

— Based on the results of the work carried out in 2026 start discussion on possible harmonized methodologies for assessing network resilience.

Deliverable: BEREC Report on Best practices for Resilience
Public consultation: Yes
Adoption of draft report for public consultation at Plenary 4, 2026
Adoption of the final Report on Best practices at Plenary 1, 2027

4.6.   Combatting fraud

As evidenced in the NIS Cooperation Group's Report of 21 February 2024 on the cybersecurity and resilience of the EU communications infrastructures and networks, there has been a wave of smishing (and vishing) attacks in the last couple of years, which are used by attackers to direct unsuspecting end users to fraudulent websites purporting to be those of government services/shipping companies/retailers, etc., or to target two-factor authentication codes sent via SMS.

BEREC and ECASEC expert group under the umbrella of ENISA were tasked with facilitating the sharing of good practices on preventing smishing, and with preparing guidelines on preventing smishing in 2025. The current information available to BEREC is that ENISA plans to publish Report on Smishing that was prepared in collaboration with BEREC by Q4 2025. Based on this report, BEREC plans to start working further on potential measures for combatting fraud more generally as smishing is only one part of the broader issue of online fraud that is growing very fast. The work will include organising meetings, workshops, gathering information and relevant data, as well as the analysis of different legal frameworks, and providing inputs to possible new legislative proposals related to privacy. As part of these initial activities, BEREC will focus on identifying the current status of the matter and the most relevant developments that need to be addressed.

The final result of this work may be a document titled 'Best practices on combatting fraud' developed in cooperation with ENISA and other partners from both the public and private sphere in Q2 2027.

The process will involve the NRAs, electronic communications providers and their associations, equipment vendors and other stakeholders as well as European institutions such as ENISA, European Commission and Europol. ENISA and NIS CG will be consulted in the course of the work.

By the end of Q4 2026, the External Workshops on Combating Fraud Report shall have been adopted.

Deliverable 1: External Workshops on Combatting Fraud and collection of information from the stakeholders
External workshop to be held in Q2 2026
Adoption of the workshop summary report at Plenary 4, 2026
Deliverable 2: BEREC best practices report on Combating Fraud
Public consultation: Yes
Adoption of draft report for public consultation at Plenary 1, 2027
Adoption of the final report at Plenary 2, 2027

5.   Strategic priority: Strengthening BEREC's capabilities and continuous improvement

The ambition of strengthening BEREC's agility, independence, inclusiveness and efficiency as a centre of expertise is set out in BEREC Action Plan 2030. In line with this vision, BEREC continuously reviews and improves its working practices in order to promote greater efficiency, high-quality deliverables, transparency and environmental sustainability.

Data-driven regulation has proven effective in regulating the electronic communications sector. Robust and relevant data provides evidence for BEREC analysis, opinions and reports, which also draw on the experience and the expertise of its members. Therefore, the data and information gathered by BEREC are important tools in carrying out NRA tasks and informing policymakers and stakeholders, as well as in terms of steering the market in the right direction in order to better enable end-users to benefit from choice, quality and competitive prices. The secure storage of BEREC data also needs to be ensured.

Regulatory activity should be proportionate, targeted and mindful of implementation costs for all stakeholders. BEREC is considering means to simplify and reduce bureaucracy across all areas of its work, in terms of both its own initiatives and when providing advice to EU institutions. More specifically, BEREC will continue promoting the harmonisation of data collection across the EU in order to minimise the administrative burden for stakeholders while strengthening the internal market. To this end, BEREC will seek to leverage the latest automation and IT tools.

BEREC and its members have successfully developed and implemented regulatory tools for non-discrimination, access remedies and price control, transparency measures in relation to end-users and undertakings, and number portability. BEREC will continue to be at the forefront of sharing and developing regulatory best practices and guidelines for ECN/S.

BEREC prioritises effective communication to ensure transparency, build trust, and strengthen its relationships with stakeholders and key target audience. By fostering open dialogue and delivering clear and consistent messages, BEREC enhances its engagement, supports informed decision-making, and upholds its commitment to accountability. BEREC remains committed to continuously improving its interaction with all stakeholders and ensuring all BEREC outputs remain relevant. BEREC will aim to ensure its work processes are transparent and that they reach its intended audience. BEREC aims to maintain a high level of trust from stakeholders and position itself as a trusted third party in stakeholder dialogues, and in its engagement with the EU institutions and other parties.

5.1. | Stakeholder engagement

BEREC is committed to working with a high level of transparency and accountability. Working practices in this regard include carrying out public consultations on draft documents, public debriefings after every plenary meeting, and maintaining a structured dialogue with sector-related associations and stakeholders by means of workshops, meetings, and the annual Stakeholders Forum in which BEREC presents its current activities and planned work. BEREC remains committed to continuously improving its interaction with all stakeholders so as to ensure that its output remains relevant. BEREC aims to ensure that its work processes are transparent and that it reaches its intended audience. The BEREC Work Programme 2026 comprises activities for achieving these objectives.

BEREC will reinforce its dialogue with the public and citizens so as to ensure that legitimate concerns are reflected in regulatory developments and any sources of apprehension are addressed appropriately. BEREC aims to maintain a high level of public trust from citizens and position itself as a trusted third party in stakeholder dialogues and in its engagement with EU institutions.

5.1.1. | Stakeholder Forum

The focus of the BEREC Stakeholder Forum in 2026 will be the BEREC Work Programme for the following year (2027) and other topics relevant to the telecoms industry and to policy makers. It will also provide a platform for stakeholders and BEREC to engage in a dialogue about BEREC's future work related to its high-level strategic objectives. The major annual public event is also an excellent opportunity for stakeholders and BEREC Working Group Co-Chairs to meet in person, at so-called 'Meet&Greet' sessions, and in an informal atmosphere to exchange ideas, concerns and solutions on developments, as well as the current situation in electronic communications markets. The feedback gathered at the Stakeholder Forum will provide valuable input for BEREC's future activities and priorities, and will inform its work going forward.

5.1.2. | BEREC Communications Plan 2026

BEREC communications activities are focused on ensuring maximum internal and external transparency and accountability of BEREC activities, strengthening its digital presence and engagement with stakeholders. This includes implementing the BEREC External Communications Strategy and annual communications plans. The objective is to strengthen the perception of BEREC as an impartial, independent, European, forward-looking expert body and to support BEREC overall strategic objectives, namely promoting full connectivity and the Digital Single Market, supporting a competition-driven and open digital ecosystem, empowering end-users, contributing to environmentally sustainable, secure and resilient digital infrastructures, and strengthening BEREC's capabilities and continuous improvement.

The overall framework of BEREC communications is presented in the multiannual BEREC External Communications Strategy. Every annual communications plan sets out the exact activities that BEREC will perform in order to deliver on these objectives. The BEREC Communications Plan 2026 is focusing on specific, tailor-made communications campaigns dedicated to particular BEREC priorities and workstreams of the BEREC Work Programme 2026.

The activities are developed and executed by BEREC and the Agency for Support for BEREC (the BEREC Office).

5.1.3. Developing the BEREC Work Programme 2027

BEREC is required to adopt an outline of the subsequent year's annual work programme by 31 January each year. The outline will serve as the first input for the draft Work Programme 2027, for which a call for input will be launched in the first quarter of 2026. After preparing the final draft Work Programme, a public consultation will follow. All steps towards the Work Programme 2027 will be in accordance with the BEREC Process for developing BEREC Work Programmes (BoR (19) 32).

Deliverable: Work Programme 2027
Public consultation: Yes
Adoption of the draft Work Programme 2027 for public consultation at Plenary 3, 2026
Adoption of the final Work Programme 2027 at Plenary 4, 2026, for publication
Other deliverable: Outline of the draft Work Programme 2027
Adoption of the Outline of the draft Work Programme 2027 by 31 January 2026, for publication and submission to the European Commission, the European Parliament and the Council of the European Union

5.2. WACC parameters' calculation according to the EC Notice

Following publication of the European Commission's Notice on the WACC[9], BEREC is tasked with the calculation of various parameters of the WACC formula according to the prescribed methodology.

In 2026, BEREC will continue to perform the annual calculation of the WACC parameters, as initiated in 2020. These parameters will be calculated at the beginning of the year and published in a separate report to allow the NRAs to base their national WACC decisions on this up-to-date information. BEREC will also select the companies which will be eligible for the peer group.

Deliverable: Report on WACC parameters 2026
Public consultation: No
Adoption at Plenary 2, 2026 for publication

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[9]   https://digital-strategy.ec.europa.eu/en/library/commission-publishes-notice-calculation-cost-capital-legacy-infrastructure.

6. BEREC's other tasks

6.1. BEREC inputs to the regulatory framework review and the DNA

According to Article 122 of the EECC, the European Commission must, by 21 December 2025, carry out a review of the functioning of the EECC and, by that date, it shall report to the European Parliament and to the Council. BEREC remains ready to assist the Commission in this exercise and, to this end, it has already started its own assessment of the extent to which the electronic communications framework is enabling the accomplishment of the EECC's objectives, and of whether the framework's provisions are effective to that end.

The European Commission has also announced a proposal concerning a Digital Networks Act, which is expected to be tabled at the beginning of 2026. BEREC will analyse such legislative initiative and will provide its expert views on it in 2026, and throughout the legislative process.

Deliverable: BEREC Input
Public consultation: No
Adoption of deliverable for publication: Q1/Q2 2026 - depending on the publication of the European Commission's proposals – and throughout the European legislative process

6.2. Monitoring quality, efficiency, and sustainability

6.2.1. Article 32/33 Phase II process

Since 2014, BEREC has undertaken an annual analysis of Articles 32/33 of the EECC (former Articles 7 and 7(a) Phase II cases), with the objective of gaining a better understanding of both the procedural and substantive aspects of these cases, and in order to inform potential reviews of BEREC Common Positions. In 2015, a comprehensive database of Phase II cases was developed, including the main elements of the cases, in particular the reasoning put forward by the European Commission, the analyses in the BEREC Opinions, and the final outcomes of each case. On 31 March 2021, the European Commission adopted Recommendation (EU) 2021/554 (the 'Procedural Recommendation') on the form, content, time limits and level of detail to be given in notifications under the procedures set in Article 32 of the EECC. In 2022, BEREC updated the Internal Guidelines for the drafting of BEREC Opinions in Articles 32 and 33 Phase II cases, taking into account the EECC, the Procedural Recommendation, and experience gained from conducting Phase II cases. BEREC will continue to add new Phase II cases to this database as and when they arise. The objective is for the database to be consulted by BEREC members, in particular by experts of Phase II cases, both for referencing a particular case and for analysing key themes among the cases over time.

BEREC will analyse and monitor the Phase II cases' process, and exchange information with the BEREC Office about the effectiveness of the updated Internal Guidelines. Depending on the number and significance of Phase II cases which will take place in 2026, BEREC will decide whether there is a need to conduct an internal workshop.

Deliverable: none

6.2.2. Report on regulatory accounting in practice

The Regulatory Accounting in Practice Report 2026 will provide an up-to-date factual overview of the regulatory accounting frameworks used in Europe and an assessment of the level of consistency achieved by NRAs. A report is prepared annually and bring up to date the previous versions which have been published on an annual basis since 2005. In 2026, emphasis will continue to be placed on consistency in regulatory accounting with respect to key access products (e.g. fibre optic) and the report will be streamlined in terms of access products considered (for instance, by reviewing the relevance of indicators and parameters covered) while retaining the in-depth analysis of methods used to identify commonalities and the reasons for differences. Given the applicability of the European Commission's WACC Notice of 2019 (see the previous Work Programme item), there will be an investigation into to what extent the report will continue to collect data on the methodology and input parameters used to calculate the rate of return on capital employed. The impact of both of these aspects on the result will also be examined.

The report will also take into account the list of relevant markets susceptible to ex ante regulation pursuant to European Commission Recommendation (EU) 2020/2245.

The report will develop a more focused analysis that concentrates on the following key whole-sale markets: Wholesale Local Access (Market 3a/2014, now Market 1/2020), Wholesale High Quality Access (Market 4/2014, now Market 2/2020) and Wholesale Central Access (Market 3b/2014, no longer in the list of relevant markets susceptible to ex ante regulation). For these markets, it will describe the regulations applied by NRAs and it will contain a comparison of the most popular combinations of cost base and cost allocation methodologies.

It will also take stock of how NRAs applied the 2024 Gigabit connectivity Recommendation (EU) 2024/539 of 6 February 2024.

BEREC will evaluate how the Report on WACC parameters 2026 provides evidence for the WACC calculation practices among NRAs, given the applicability of the WACC Notice. Depending on the result of the evaluation, the collection and analysis of data on the current calculation of the weighted average cost of capital (WACC) may be updated. It will include data on whether and how NRAs account for the higher risk of investing in VHCNs (for example, through the application of a risk premium which is to be added to the calculated WACC).

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Deliverable: Regulatory Accounting in practice Report 2026
Public consultation: No
Adoption of the final report at Plenary 4, 2026, for publication
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6.2.3. BEREC Annual Reports

According to the BEREC Regulation, BEREC must provide its annual activity report to the European Parliament, the Council, the European Commission and the European Economic and Social Committee by 15 June of the year after the year which is being reported on in the annual activity report. BEREC must report annually on technical matters within its competence, in particular on market developments in the electronic communications sector.

BEREC will continue to publish its annual report on its activities, as well as an annual report on developments in the sector as part of a single document. The annual report on BEREC activities focuses on the outcome of the work of BEREC based on the relevant work programme, whereas the annual report on developments in the electronic communications sector summarises BEREC's view of the past year and provides an outlook on challenges in the sector.

6.3. BEREC ad hoc work

6.3.1. Ad hoc input to the EU/NRAs

In line with Article 4 of the BEREC Regulation, in addition to the input which BEREC explicitly has to provide to the European Commission, BEREC has to also assist and advise the NRAs, the European Parliament, the Council and the European Commission, and cooperate with the NRAs and the European Commission – upon request or on its own initiative – on any technical matter regarding electronic communications within its remit.

BEREC has been providing a forum for NRAs to discuss matters related to the electronic communications regulatory framework, and has contributed to EU institutions on key legislative initiatives in the sector.

BEREC will also make itself available to engage with the European Commission in relation to the review of the BEREC Regulation, as well as on matters concerning any further sectoral legislative initiatives of the European Commission.

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Deliverable: Various inputs (report, workshop, opinion, position
paper, etc.) on request of the EU institutions
Public consultation: No
Adoption of deliverable for publication: Depending on the request of
the EU institutions
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6.3.2. | **Peer review process and engaging with RSPG**

BEREC and the Radio Spectrum Policy Group (RSPG) agreed on working arrangements (BoR (19) 100) on 13 June 2019. These set out the cooperation methods for the purpose of BEREC's participation in the Peer Review Forum in accordance with the requirements of Article 35 of the EECC. The cooperation methods are as follows:

a) using the Peer Review Forum as an instrument of peer-learning;

b) promoting the benefits of the Peer Review Forum since it convenes national NRAs and other competent authorities with expertise on comparative or competitive selection procedures in the regulatory framework of electronic communications;

c) cooperating on the implementation of the Peer Review Forum; and

d) appointing 'liaison officers' in both BEREC and the RSPG so as to strengthen the relationship between the two bodies and facilitate the implementation of this arrangement; the Wireless Network Evolution Working Group Co-Chairs are BEREC's 'liaison officers'.

BEREC's participation in the Peer Review Forum contributes to the objective of promoting full connectivity through discussions with the RSPG about the market-shaping aspects of spectrum assignment.

The Peer Review Forum is convened by the RSPG only when required.[10]

In addition to activities as part of the Peer Review Forum, BEREC members are prepared engage with the RSPG and European institutions on topics of mutual interest, including on any policy initiatives or legislative proposals of the European Commission.

Deliverable: none

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[10] https://radio-spectrum-policy-group.ec.europa.eu/index_en.

6.3.3. | Roaming regulation potential ad hoc work in 2026

In the case of the European Commission request a BEREC Opinion for its interim review report due in June 2027, BEREC will need to commence preparatory work on this input already in 2026. In addition, in light of the geographical enlargement of RLAH to Ukraine and Moldova, BEREC will update the Retail and Wholesale Guidelines taking into account the amended geographical scope.

Deliverable: BEREC Retail Roaming Guidelines & BEREC Wholesale Roaming Guidelines
Public consultation: Yes
Adoption of the draft guidelines for public consultation at Plenary 1, 2026
Adoption of the final guidelines at Plenary 2, 2026, for publication
Other deliverable: TBD

7. | Institutional and international cooperation

In line with its mandate under Article 35 of the BEREC Regulation, institutional and international relations are aligned with the EU's external relations policy and strategic priorities, and constitute an integral part of BEREC annual work programme.

Cooperation with EU institutions and international organisations is increasingly relevant with regard to addressing challenges in digital markets. BEREC will continue its efforts, in close cooperation with the European Commission, to foster dialogue and collaboration with sector networks, institutions and policymakers involved in digital regulation, as well as with NRAs outside the EU. Where relevant, BEREC will continue to seek to establish formal working arrangements.

BEREC has developed a Medium-Term Strategy for international and institutional cooperation, which both are now part of the BEREC Strategy 2026-2030.

Deliverable: Relations with other institutions and international cooperation
As required and agreed with BEREC counterparts: organisation of joint meetings, summits or workshops

8. | **Potential BEREC work for 2027 and beyond**

Given the number of workstreams selected for the Work Programme 2026 and BEREC priorities, several proposals could not be included. In order not to lose track of these potential workstreams, this section includes items which BEREC may include in the Work Programme 2027 and beyond. The list of items mentioned below is therefore for information purposes only and should not be regarded as final. The input provided by stakeholders on these items during the public consultation in 2025 for the Work Programme 2026 will be considered when adopting a final list. Furthermore, BEREC may consider other new workstreams for 2027, which will be influenced by a new call for input from stakeholders.

8.1. | ### Monitoring of IP interconnection issues

BEREC published comprehensive Report on the IP Interconnection ecosystem (BoR (24) 177) at the end of 2024. In that report, the following conclusion was drawn: 'BEREC is aware that there are a few IP-IC disputes that have occurred since 2017, and BEREC's workshops also revealed similar insights.' However, until now, no substantial evolution has been observed. In 2026, there will be no need to update the report, especially considering the anticipated changes in the regulatory framework. Therefore, BEREC will continue to closely monitor the area and will update the report at a later stage, if necessary.

8.2. | ### Deepening BEREC's understanding on PIA regulation under symmetric and asymmetric regulatory regimes

Building on information gathered as part of the compilation of the BEREC Report on the regulation of physical infrastructure access, particularly on the information provided in section 6 on regulatory measures relating to PIA for incentivising VHCNs rollout, the aim of this report is to deepen understanding of the interplay between symmetric and asymmetric regulation of PIA. The report could deliver on:

— effective implementation of PIA remedies, both in a symmetric and asymmetric setting;

— the impact of PIA regulation on the downstream markets identified in the sector;

— PIA and dark fibre as substitute services;

— (a)symmetric regulation application in urban/rural areas, relevant country cases and conclusions to be drawn based on the implementation;

— regulation applicable to PI operated by wholesale-only operators;

— regulation applicable to non-telecommunications operators' physical infrastructure.

The aim of this effort would be to inform the community of important practices in regulating PIA and, if possible, advise on best practices to follow when access to physical infrastructure is deemed essential for the development of effective competition.

8.3. Further BEREC work on connected and automated mobility

Connected and automated mobility (CAM) represents a transformative force across both the transport and digital ecosystems. It offers substantial potential for enhancing mobility efficiency, improving road safety, reducing the environmental footprint of the transport sector, and fostering economic growth in areas such as logistics, geospatial services and data markets. As mobility ecosystems evolve, resilient, high-performance communications infrastructure and interoperability across platforms and borders will be of critical importance in securing Europe's leadership in next-generation transport.

Realising these benefits increasingly depends on the availability of personalised, specialised and advanced connectivity services – such as low-latency network slicing and edge computing – tailored to the needs of autonomous driving, vehicle-to-everything (V2X) communication and real-time data exchange. Mobile networks also serve as key enablers for Intelligent Transport Systems (ITS) services such as next generation eCall (NG eCall) and Cooperative ITS (C-ITS) services. Ensuring adequate quality of service and comprehensive road network coverage has been identified as a critical factor – either enabling or hindering the successful deployment of these services.

In such a context, BEREC could contribute by analysing these technical and performance requirements during the workshop debate, and by identifying any connectivity investment gaps or bottlenecks that may hinder the uptake of connected mobility. The analysis could also explore potential business models for electronic communications providers in this space.

Overall, BEREC's work would complement and support the ongoing efforts of the European Commission's to develop 5G corridors that enable seamless automated mobility across the EU.

8.4. Exchange of impact assessment practices of mobile network sharing in terms of environmental sustainability and supporting mobile network sharing indicators

The BEREC Report on Infrastructure sharing as a lever for ECN/ECS environmental sustainability (BoR (25) 68) examined how regulatory tools might enhance the environmental performance of telecommunications by minimising the footprint associated with network deployment and operation. BEREC members reported limited inclusion of environmental aspects in their decisions on infrastructure sharing, due to specific barriers such as lack of mandate, limited expertise and data, difficulty in balancing these considerations with other regulatory/policy goals (e.g. competition, cost considerations), and the need for standardised methodologies for environmental assessments. The report concluded that, in order to foster the sharing of impact assessment on the topic at hand, it would be relevant for BEREC to include sharing an environmental component in its future efforts on infrastructure, in conjunction with the objectives set in its mid-term strategy. So as to advance the integration of environmental considerations into infrastructure sharing, further work, such as a dedicated workshop to further explore mobile network sharing from a technical and environmental perspective, may become relevant in the future. Given the higher environmental footprint of mobile networks and their more complex sharing arrangements compared to fixed networks, such a workshop would aim to deepen understanding of the opportunities and limitations of sharing solutions such as MORAN[11], MOCN[12] and DSS[13]. As the report highlights, most NRAs lack access to quantitative data on mobile infrastructure sharing which, in turn, limits their ability to assess environmental impacts. This workshop would support capacity-building, data exchange, and greater alignment on best practices to integrate sustainability into infrastructure sharing strategies.

8.5. Other workstreams

In addition to the workstreams outlined in this chapter, several other projects have been identified over the course of the preparatory process, and these will be kept under review for possible future consideration.

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[11] MORAN (Multi-Operator Radio Access Network): a network sharing concept where multiple mobile operators share the same radio access network infrastructure (such as antennas and base stations) but use separate spectrum bands and core networks. This allows for cost savings on physical infrastructure while maintaining the independent operation of each operator's network.

[12] MOCN (Multi-Operator Core Network): a more integrated form of network sharing where multiple operators share not only the radio access network but also the spectrum and sometimes core network resources. This enables even greater resource efficiency but with less separation between operators' networks.

[13] DSS (Dynamic Spectrum Sharing): A technology that allows for different generations of mobile networks (e.g. 4G and 5G) to operate simultaneously on the same frequency bands, thereby enabling flexible and efficient usage of available spectrum during network upgrades.

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