

BEREC Input to the European Commission's Call for Evidence on the Digital Decade Policy Programme

22 December 2025

BEREC welcomes the opportunity to contribute to the Call for Evidence on the review of the Digital Decade Policy Programme (DDPP) objectives.

Given the rapid pace of technological change, BEREC considers that this is an appropriate time to assess whether the DDPP targets and indicators remain fit for purpose.

BEREC would like to highlight the following considerations for the review process.

First, the targets should remain relevant, i.e., they should aim at achieving general policy objectives. Furthermore, in order to be reasonably pursued, they need to be shared and supported by the relevant stakeholders. To achieve this, it is important that the revised Decision establishing the DDPP not only duly reflects stakeholder contributions received through the public consultation, but also clearly identifies how each revised or new target derives from the different policy objectives in force.

As concerns connectivity, the policy objectives set out in the European Electronic Communication Code (EECC) remain valid and should therefore provide the framework of reference to assess the suitability of the current DDPP connectivity targets. The enduring validity of the current policy goals explains, *inter alia*, why the updated BEREC Guidelines on Geographical surveys of network deployments (under public consultation) - a key input for NRAs in the delivery of broadband coverage and QoS information to fulfil the EECC objectives- are based on Art. 22 EECC.

Promoting competition, connectivity, end-user rights and the internal market for electronic communications networks and services remains central under the Code. Any update to the DDPP connectivity targets and indicators should therefore be designed in coherence with these overall policy objectives.

In addition, the inclusion of environmental objectives would also be welcomed, as mentioned in the EC's call for evidence and in line with the BEREC 2026-2030 strategy.

BEREC further stresses that targets should be ambitious, while remaining achievable within the envisaged timeframe. It should be noted indeed that the existing targets for certain Member States can only be achieved with great effort, if at all. Accordingly, the targets should, on the one hand, strike an appropriate balance between Europe's needs and the efforts required from both the public and private sectors to deliver them. On the other hand, they should be reachable through any current or future mix of suitable network technologies, in line with the principle of technological neutrality that underpins the entire regulatory framework.

In tight relation with that, in order to be future-proof and achievable, the targets should be defined considering, among other things, the energy requirements implied by the ambitions at stake, as well as the actual needs on the demand side.

Moreover, the targets also need to be clear, measurable and not open to interpretation, so that appropriate indicators can be defined to assess their pace of delivery and fulfilment. In order to enable robust monitoring of implementation progress and target achievement, monitoring arrangements should be proportionate, deliverable at reasonable cost, and feasible both for stakeholders providing information and for the competent authorities administering the monitoring framework.

A clear and robust methodology is essential when defining indicators for digital targets, in order to ensure that progress at Member States' level can be measured objectively and that different performances can be fully compared.

The redefinition of the indicators during the period established for achieving the DDPP targets should be avoided, and should occur only where an indicator no longer reliably reflects progress towards the target. From BEREC's perspective, where adjustments are necessary, it is preferable to introduce a new KPI rather than change an existing one in order to ensure consistent monitoring of Member States' trajectories over time. Importantly, this implies that, whenever modifications to the targets are necessary, a review of the KPIs used to measure progress towards those targets should likewise be envisaged. In this respect, the inclusion of a review clause in the DDPP could be considered, to govern the procedure for any update of the targets and corresponding indicators, where necessary.

Finally, BEREC believes that independent NRAs hold the technical expertise to contribute to defining the indicators measuring the achievement of the targets and monitoring them, and that the DDPP review therefore represents a good occasion to formalize the NRAs' involvement in such process.