

GSMA and Connect Europe Joint Response to the BEREC Public Consultation on the 2026 revision of the Retail and Wholesale Roaming Guidelines

The GSMA and Connect Europe take note of the 2026 revision of the BEREC Retail Roaming Guidelines and BEREC Wholesale Roaming Guidelines to reflect the extension of the *Roam Like at Home (RLAH)* area to Ukraine and Moldova as of 1 January 2026. We support BEREC's efforts to ensure the consistent application of the Roaming Regulation and to provide guidance to national regulatory authorities and market players. In this context, we would also like to share our views on the broader question of the extension of RLAH to non-EU countries, insofar as it has several implications for the application of the existing framework. GSMA and Connect Europe appreciate the tracked changes versions of both guidelines as this facilitates the assessment of the proposed amendments.

The RLAH has historically been linked to participation in the EU internal market and to the full implementation of the EU acquis. The extension of RLAH to Ukraine and Moldova reflects specific and exceptional circumstances and should not be interpreted as establishing a general precedent for further geographical expansion. Any extension of roaming privileges should only occur once the EU accession has been completed, with full implementation of the EU acquis as the prerequisite. Against this background, any potential extension of RLAH to additional third countries should be approached with caution, as it does not only involve a straightforward geographical extension, but a structural change in the technical, operational and business model of roaming in such RLAH areas. Therefore, any such potential extension should be preceded by a comprehensive, detailed, accurate and transparent impact assessment, to carefully account for the full range of retail, wholesale and IT costs that such extension would add to the already significant burden imposed on EU host operators.

Moreover, extending RLAH ahead of EU accession, and in the absence of full regulatory alignment, risks undermining incentives for necessary reforms and does not reflect the current level of convergence with EU rules.

We note that the process of integrating the Western Balkan Six (WB6) into the RLAH framework has already been initiated via bilateral trade agreements. In this context, since 2022, EU and WB operators have successfully implemented a voluntary roaming framework, which has delivered tangible consumer benefits, including lower prices and increased usage. At the same time, progress on the complementary reforms expected from WB6 governments, particularly those aimed at improving investment conditions—has been limited. Moving prematurely to a mandatory RLAH regime would therefore risk

disregarding an effective and proportionate solution, while potentially weakening incentives for the completion of necessary reforms.

From a regulatory and implementation perspective, a fragmented extension of the RLAH area to WB6 through multiple bilateral arrangements will introduce additional complexity by adding six RLAH zones to the current three zones, in the absence of a full mutual reciprocity regime, and could put the consistent application of the Roaming Regulation at risk. To illustrate this, the current extension to Ukraine and Moldova already generates a non-symmetric origin-destination matrix of ten distinct routing cases, of which six are explicitly excluded from RLAH (including Ukraine-Moldova and EEA-EFTA-Ukraine/Moldova pairs). A further WB6 extension would bring the total to nine distinct bilateral RLAH zones, none of which would be in full mutual reciprocity. Each such zone requires specific parameterization in operators' rating, billing and customer management systems — costs which are entirely absent from current regulatory cost models. BEREC proposed changes to both retail and wholesale guidelines and the table of applicability show the complexity of the system that the European Commission is creating with the current extensions of RLAH to non-EU countries.

The creation of parallel roaming regimes with differing rights and obligations will increase complexity and uncertainty for both operators and consumers, and complicate supervisory tasks for national regulatory authorities and will most probably lead to consumer complaints due to lack of clarity in the tariff regime applying to traffic in specific cases.

Notably, consumers would face inconsistent rules depending on the country pair. For example, a Czech customer in Ukraine could call the EU at RLAH rates but not Moldova or Montenegro; an Albanian visitor in Berlin could call Albania or the EU at RLAH rates, but not Norway or Moldova.

This fragmented landscape would make transparency extremely challenging, likely increasing customer complaints and dissatisfaction, while leaving operators with no ability to resolve the underlying legal inconsistencies. This could, in turn, incentivise consumers and businesses to switch to other types of providers to the detriment of EU operators.

The extension of the RLAH area to markets not yet fully aligned with the EU framework would entail revenue losses and implementation costs, including adjustments to complex IT systems. The potential financial and operational impact on operators should be carefully considered and evaluated before any extension decision is taken.

This comes at a time when the EU is emphasizing the need for significant investment in best-in-class connectivity, cybersecurity and resilience.

In conclusion, ensuring legal clarity, regulatory consistency and appropriate investment incentives remains essential. At the same time, it is important to maintain the integrity of the existing framework as established under EU law, including its link to the EU internal market and the full implementation of the acquis. Extending core elements of this framework, in the absence of full regulatory alignment, would risk undermining its coherence and predictability, as well as weakening incentives for necessary reforms. It could also have implications for investment capacity in the sector, at a time when significant resources are required to support connectivity, resilience and innovation objectives across the EU.