



MVNO Europe short-form response to BEREC Public Consultations

BoR (26) 37 and BoR (26) 38

Amendments to Retail Roaming Guidelines and Wholesale Roaming Guidelines

15 April 2026

MVNO Europe, the association representing Mobile Virtual Network Operators¹, welcomes the fact that BEREC is consulting on proposed amendments/updates to its Retail Roaming Guidelines and to its Wholesale Roaming Guidelines.

MVNO Europe wishes to place it on the record that it is grateful that BEREC usefully provides, and regularly updates, its Retail Roaming Guidelines and its Wholesale Roaming Guidelines. We encourage BEREC to continue to do so in a timely manner going forward, as and when modifications are justified. This must occur as soon as a material change is agreed, not after the fact.

It is clear that the amendments put to consultation are purely technical updates, reflecting:

- a) The agreements applicable, between the EU and Ukraine, and between the EU and Moldova, as of 1 January 2026.
- b) The incorporation of Roam-Like-At-Home provisions with Iceland, Liechtenstein and Norway in the EEA agreement, and its subsequent approval by their respective national parliaments.
- c) The repeal of the provisions on security of networks and services which were contained in Articles 40 and 41 of the European Electronic Communications Code, and their replacement with application instead of the common NIS 2 regime (Directive (EU) 2022/2555). The repeal is covered by Article 43 the NIS 2 Directive amending Directive (EU) 2018/1972.

¹ <http://mvnoeurope.eu/members/>

This being stated, MVNO Europe is keenly aware that the addition of Ukraine and Moldova from 1 January 2026 has introduced new YES/NO scenarios, as is correctly detailed in both sets of draft BEREC Guidelines.

The EU's new policy of aiming to add further countries to the EU's Roam-Like-At-Home regime, prior to their accession to the EU, creates new complexities.

At the retail level, we refer to the requirement for all mobile operators to amend customer contracts and provide an automatic message, providing personalised pricing information, information about value-added services, emergency communications and public warning mobile applications (when relevant) when the customer enters the visited country (the roaming welcome message).

At the wholesale level, there is a need to ensure that competition is not distorted, i.e. that measures do not favour or harm particular operators, and ensure economic viability for all operators, including MVNOs.

Remarks made by stakeholders during a Meet & Greet Session at the BEREC Stakeholder Forum on 31 March 2026 indicated, in MVNO Europe's opinion correctly, that operators are seriously concerned about compounded complexity, especially if/when (6) Western Balkan countries could join the Roam-Like-At-Home regime going forward.

One of the consequences, especially if/when (6) Western Balkan countries would be included, would be that all retail mobile operators would have to have to address a complex matrix of YES/NO scenarios in their communications with customers, notably in contracts and in roaming welcome messages:

- a) Creating serious operational complexities for the operators aiming to tailor messages to their customers.
- b) Entailing serious risks that messages addressed to customers, however well intended and well crafted, would not readily be (fully) understood by customers, notably given the political expectations created by the EU and by customers' respective national governments.
- c) Resulting in customer complaints, from customers simply not being able to understand the expectations created by the EU's or by customers' country's political decisions.

Operators could therefore face a situation in which they bear the brunt of political decisions, some of the detail of which is not readily explainable to their customers.

MVNO Europe fully understands that BEREC's role, in preparing and publishing updating its retail and wholesale guidelines, is purely explanatory towards the industry at this stage.

The closing message of this MVNO Europe response is, however, to request that BEREC's leadership explains systematically to interlocutors at the political level that measures put forward, however well intended, on a flagship European integration project such as mobile roaming, must be workable and understandable in practice at the retail level to avoid disappointment of customers/citizens, and that measures must not distort competition, including at wholesale level.

This probably entails that the political/legislative/technical arrangements must ensure that, from day one of the addition of a new country, the Roam-Like-At-Home regime is fully applicable at wholesale level and at retail level BETWEEN ALL COUNTRIES INVOLVED, avoiding any YES/NO scenarios to be communicated to customers.

MVNO Europe Contact Details

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