



MVNO Europe short-form response to BEREC Public Consultation BoR (25) 183

Draft BEREC Report on Switching and Termination of Contracts

30 January 2026

MVNO Europe, the association representing Mobile Virtual Network Operators¹, welcomes the fact that BEREC is consulting on its draft Report on Switching and Termination of Contracts.

The sector-specific consumer protection measures contained in Articles 106, 105 and 107 of the EEC empower end-users and they are crucial in enabling challenger operators, such as MVNOs, to win customers, based on the merits of their service propositions. Measures addressing number portability, operator switching, contractual periods, contract termination conditions, etc. are evidently beneficial to a well-functioning and competitive telecommunications market, delivering real benefits for European citizens and European businesses.

MVNO Europe is grateful that BEREC provides, in the draft Report, a detailed overview of NRA practices relating to implementation of the provider switching and number portability measures.

Mobile communications markets

MVNO Europe agrees with BEREC's finding that mobile number portability is implemented in all EU Member States, and is functioning well, including the fact that the one-day rule for mobile portability is generally respected (*page 15, para 6*).

MVNOs contribute strongly to innovation and competition and provide clear Business to Consumer (B2C) and Business to Business (B2B) end-user benefits, by offering the most flexible and least restrictive mobile communications solutions on the market.

MVNOs typically do not engage in SIM-locking mobile handsets.

¹ <http://mvnoeurope.eu/members/>

In-vehicle connectivity and switching

Applying the same switching obligations for end-users in the connected car context (i.e. enabling the persons owning/leasing/driving cars to switch suppliers of in-car connectivity) - particularly in relation to in-car Wi-Fi - raises significant technical and economic concerns that merit careful consideration.

Connected vehicles are fundamentally different from mobile phones. Enabling switching in this context would require that vehicles support two separate SIMs: one for services such as telemetry, telematics, eCall, and infotainment, and another for optional services such as in-car Wi-Fi.

Implementing dual-SIM or eSIM provisioning capabilities would necessitate substantial reengineering of the vehicle's Telematics Control Unit (TCU), including hardware redesign, software updates, and integration of complex multi-profile management systems. This is not only technically challenging but also financially burdensome for the European automotive sector.

If required to implement switching between Internet Access Providers, European automobile manufacturers may be forced to discontinue in-car Wi-Fi offerings altogether, depriving consumers of a service which, while optional, adds convenience and value.

Importantly, end-users (the persons owning/leasing/driving cars) already have alternative means of accessing in-car internet, such as mobile hotspot features on smartphones, tablets equipped with cellular connectivity or dongles, without requiring structural changes to the vehicle.

Given these realities, a proportionate and pragmatic approach is needed as part of the Digital Networks Act. An exemption from switching obligations for connected vehicles should be made. This would preserve innovation, avoid unnecessary costs to the European automotive sector, and ensure that regulatory goals are met without unintended negative consequences.

For the avoidance of doubt, MVNO Europe supports the ability for automobile manufacturers to switch their suppliers of connectivity services to cars, and remarks that the advent of eSIMs for IoT/M2M/Connected Vehicles enables automobile manufacturers to do so through remote provisioning of eSIMs.

MVNO Europe Contact Details

Should you require any clarifications or further information on the elements and positions set out by MVNO Europe in this document, and invite an MVNO Europe speaker, please contact:

████████████████████, Secretariat of MVNO Europe

████████████████████@mvnoeurope.eu | www.mvnoeurope.eu

Rue de la Loi 38, 1000 Brussels – 5th floor.