

**The GSMA Response to the Public Consultation on the Draft Updated  
BEREC Guidelines on  
Geographical Surveys of Network Deployments  
9<sup>th</sup> of February 2026**

## Introduction

We welcome the opportunity to provide comments on the BEREC Guidelines on **geographical surveys of network deployments**. The revision of the Guidelines and the public consultation come at a time when the EEC is to undergo a **fundamental review through the proposed Digital Networks Act (DNA)**. As Europe's telecoms sector increasingly trails behind other developed economies in availability of state-of-the-art digital infrastructure while facing mounting global competition and massive investment gaps, the need for a bold and future-proof reform, encompassing not only the DNA but also of the guidelines adopted based on today's EEC, has never been more urgent. As highlighted by the Letta and Draghi reports, without decisive action, Europe risks falling further behind in technological leadership, innovation, and digital infrastructure development. **Simplifying the overall framework, reducing the regulatory burden and prioritizing speed and agility must be priorities.**

**Moreover, the security environment has worsened, and all regulatory transparency requirements must therefore be comprehensively and critically reassessed.** Attacks on critical power lines as recently happened in Germany, acts of sabotage targeting natural gas pipelines, and multiple disruptions to the communication networks illustrate the increasing and tangible threat to critical infrastructures. The protection of telecommunications networks as critical infrastructure is of paramount importance for social cohesion, the economy, the healthcare system, and public security. This essential role must be effectively and comprehensively reflected in the design and scope of transparency obligations.

Reporting obligations should be simplified and harmonized within the EU to avoid differing requirements, excessive obligations and security harms. For this purpose, a **simplification of the current provisions set out in Articles 20 and 22 EEC would be necessary**. It is essential to follow the principles of data minimization and data avoidance, ensuring that the collection and provision of information - in terms of scope, format, and purpose - are **strictly limited to what is necessary** (e.g. monitoring rollout progress).

From this perspective of the upcoming reform, also the present BEREC consultation is of direct relevance. While the current legal framework will continue to apply until the implementation of the DNA, the revision of the Guidelines **should already be guided by the overarching objectives of simplification and the reduction of transparency and reporting obligations**. Aligning the updated Guidelines with these principles, while remaining within the scope of the current legal text, is a chance to reduce red tape and would ensure consistency with the policy direction underpinning the forthcoming legislative framework. **From this perspective, the current proposals by BEREC look to be not ambitious enough.**

### Concerning the individual proposals:

1. **We support** the following changes:
  - a. We urge BEREC to remove the expected peak time parameter entirely from the Guidelines, rather than simply maintaining its optional status. Our concern is that any definition of "peak time speeds" that implicitly or explicitly incorporates dynamic elements - such as network load, actual throughput under congestion, or degraded performance conditions - would constitute a fundamental shift away from established coverage-mapping principles. These parameters are inherently unstable, highly variable over time, and therefore incompatible with a robust, reproducible, and forward-looking regulatory cartography. A regulatory framework relying on such volatile input's risks creating inconsistency,

undermining comparability, and imposing obligations that cannot be met in a technically sound or operationally meaningful manner.

2. **We do not support** the following changes:

- a. **Publication of data** (section 2.8): The proposed changes are understood in such a way that the publication of data from a geographical survey is considered an additional important instrument as an information tool for end customers. It should be emphasized that **there are already various options available on the market** for end customers to obtain information about coverage and service offerings. For instance, network operators already provide extensive detailed information. In addition, there are comparison portals through which end customers can obtain relevant information. Given that **Article 22 also requires consideration of information tools already available on the market, the proposed changes do not appear necessary and proportionate.**
- b. **Upload speeds:** Gathering data on maximum **upload speed** class is proposed to be optional. It can be assumed that information regarding the upload capacity of a connection constitutes an important piece of information for consumers. It is therefore **advisable to continue collecting upload speed data.**

Upload speeds of broadband connections in Europe are becoming increasingly important due to a structural shift in how customers work and consume digital services. In a nutshell, sufficient and reliable upload speed is not a niche technical requirement anymore - it is economic, social, and strategic. Historically, broadband demand in Europe focused on consumption (web browsing, streaming, downloads). That model is changing rapidly.

Today, households and SMEs increasingly produce data: cloud collaboration (Microsoft 365, Google Workspace), video conferencing and virtual meetings, and remote work, content creation (video, streaming, design). These activities are upload intensive. According to OECD, around 12–20% of the EU workforce now works remotely or hybrid. For knowledge-intensive sectors, this proportion is likely to be much higher. Cloud, AI use, and data sovereignty incl. real time backups to EU based cloud infrastructure all require strong uplink capacity. Especially AI-intensive workloads increasingly involve continuous data uploads (training data, telemetry, sensor feeds). Against this background, making upload speed optional does not look consistent.

- c. **Designation of areas:** The wording of the BEREC Guidelines in two instances insinuates that the **designation of areas** where no undertaking or public authority has deployed or is planning to deploy a very high capacity network or significantly upgrade or extend its network to a performance of at least 100 Mbps download speeds according to Article 22 (2) EEC is a requirement (“*shall*” (p. 4); “*the need to designate areas...*” (p. 24, in para 69). Yet Article 22 (2) EEC foresees that such **designation of areas is optional**. This must be reflected in the wording in chapter 1.1 (p. 4, second paragraph) and in paragraph 69 of the BEREC Guidelines.
- d. **Forecast:** Paragraph 101 (b) suggests that a detailed and updated survey of **forecasts of appropriate characteristics** may assist the relevant authority to anticipate some of the information required by the State Aid Guidelines in the context of the obligatory public consultation. With a view to the new EU

Commission’s **goal to reduce bureaucracy and red tape** for undertakings, this suggestion **should be deleted**. Rather, it is to be recommended that, as stated alternatively in para 101 b), it is **sufficient to gather information about forecasts solely by means of a public consultation mechanism** (i.e., data submission is voluntary!) on the areas where public intervention is envisaged. Paragraph 109 refers to “unwanted litigiousness and uncertainty” in cases where private investors do not declare their future rollout plans in the framework of public consultations for State Aid without subsequent verification. Yet this is no reason to conduct forecasts in the first place: It is sufficient if (as also mentioned in paragraph 101), for the purposes of State Aid, that **public consultations on the respective areas** are conducted, thus guaranteeing that crowding-out is prevented if private investors declare future rollout plans for that area.

- e. Additionally, **mobile forecasts are becoming increasingly meaningless**, as network coverage is now close to 100% nationwide or is being closely monitored by the NRA via coverage obligations. In the interest of reducing workload and bureaucracy, such forecasts can therefore be dispensed with.
- f. **Cell-edge:** The cell-edge is already implicitly embedded in coverage models, as coverage thresholds are typically defined based on cell-edge signal levels. However, we see significant risks if cell-edge were to become an explicit or standalone regulatory objective.

First, measuring the cell-edge in a consistent and reproducible way is difficult in practice. Identifying the exact physical location of the cell-edge on the ground is complex and not stable over time, which creates clear challenges for regulatory verification.

Second, the cell-edge does not represent a consistent target across different environments:

- in dense urban areas with short inter-site distances, performance at the cell-edge can remain relatively high
- in rural areas, where inter-site distances are much larger, performance at the cell-edge is significantly lower
- frequency configurations are usually richer in urban areas and more limited in rural ones which further affects achievable performance at the cell-edge

As a result, the cell-edge is a highly variable metric, strongly dependent on geography, network topology and spectrum availability. This variability makes it difficult to define a clear and consistent reference that could be easily understood by users or compared across regions.

In addition, we have strong concerns regarding statistical robustness as the cell-edge represents only a limited subset of samples. Isolating it as a regulatory metric would therefore weaken the reliability of coverage assessments. It also raises verification challenges as identifying and measuring the exact physical cell-edge on the ground is complex and unstable.

For these reasons, a global, probabilistic coverage approach remains far more robust, meaningful and verifiable than isolating specific edge conditions.

- g. **Indoor coverage:** Indoor coverage cannot be defined in an absolute or building-specific way due to the very high variability of indoor environments (building materials, height, internal layout and user location); the generated data do not even remotely represent the reality since each building differs in how it impedes the propagation of spectrum based on each building's characteristics. For this reason, we do not agree with the new proposal in section 2.4.2.2 to request indoor mobile broadband coverage data for each building or single point within grid since this doesn't provide any benefit to anyone.

### **We propose the following additional changes:**

#### **Practical and operational considerations**

We would also wish to highlight additional operational challenges as collecting new data sets creates additional workload, with unclear availability of some data.

Also RAN sharing arrangements can further complicate data collection and attribution

#### **Verification of broadband data**

92. *should be amended:* Such verifications may be conducted by NRAs, i.e. be optional.

93. *should be deleted entirely:*

First, NRAs should not be allowed to define more ambitious thresholds than a 95% success rate (which the "at least" wording suggests), as it would retroactively alter well established measures.

Second, this perhaps would simply be used to raise QoS targets that cannot be fulfilled with existing network structures and would solely be used to discredit the efforts of European MNOs to improve their network quality.

Third, QoS-2 test and for sure QoS-3 tests may often be distorted by factors like devices and building structures to affect the outcome of those tests, becoming, one may, say, a QoE(experience) not of service. As both factors cannot be controlled by MNOs and, therefore, must be excluded from any form of "QoS" testing.

#### **Network capacity for FWA networks**

We suggest deleting paragraph 64: "64. NRAs may consider issues such as network capacity for FWA networks when determining FWA coverage," since the capacity changes over time and is not compatible with the timing with which the map is requested. Furthermore, to protect the service offered to customers, the FWA network type requires each operator to pay particular attention to network capacity when selling the FWA service. Each operator will attempt to resolve capacity issues within a short timeframe.

Finally, we would like to stress that we appreciate that BEREC **presented the draft amendments in practical "track changes" format**, thereby allowing stakeholders to clearly discern proposed amendments.