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BEREC
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30 January 2024

RE: Public Consultation on the draft BEREC Report on Switching and Termination of contracts (BoR (25) 183)

Dear Sir/Madame,

Transatel welcomes the opportunity to contribute to this public consultation on the Draft BEREC Report on Switching and Termination of Contracts. We support the overarching goal of empowering users and promoting fair, competitive digital markets. However, we believe that applying retail switching obligations designed for consumer mobile devices to connected vehicles would be disproportionate and risk unintended negative consequences.

1. Connected Vehicles Operate in a Distinct Technical Environment

Connected vehicles rely on a highly integrated Telematics Control Unit (**TCU)** that provides essential operational and safety functions, including:

- telemetry and predictive maintenance
- telematics and remote diagnostics
- eCall and emergency systems
- security updates
- infotainment platforms

These systems are built around a single, secure connectivity profile deeply embedded into the vehicle's architecture.

By contrast, smartphones are designed from the outset for user-driven SIM management and provider switching. The two environments are fundamentally different.

2. Introducing End-User Switching Would Require Major Redesigns

To enable end-user switching of in-vehicle internet providers, European automotive manufacturers would be required to support two separate connectivity profiles:

- one for safety and vehicle-management functions,
- one for optional consumer services, such as in-vehicle WiFi.

Implementing this would require substantial changes, including:

- hardware redesign to accommodate dual-SIM or multi-eSIM management,
- new software stacks and secure provisioning systems,

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- re-validation and re-certification across multiple vehicle platforms.

These changes would impose significant engineering and financial burdens on the automotive sector without commensurate benefits for consumers.

3. Risk of Reduced Service Availability for Consumers

Given the cost and complexity of such redesigns, many European vehicle manufacturers would likely choose to withdraw optional in-vehicle WiFi services rather than undertake the required modifications. As a result, consumers could lose access to a service they value, even though it is non-essential and already optional.

4. Consumers Already Have Easy Alternatives for In-Vehicle Connectivity

Users today can readily access in-vehicle internet using:

- smartphone tethering (mobile hotspot),
- tablets with integrated cellular connectivity,
- portable dongles or WiFi units.

These alternatives provide users with complete freedom to choose their connectivity provider without requiring structural changes to the vehicle. In practice, users already enjoy effective choice over their in-vehicle internet access.

5. Vehicle Level Switching Is Already Enabled by eSIM Technology

Transatel strongly supports competition in the automotive connectivity supply chain. Importantly, vehicle manufacturers already have the ability to switch their connectivity provider through:

- IoT/M2M eSIM remote-provisioning standards,
- over-the-air profile downloads and updates.

This ensures that competition between connectivity providers at the wholesale/vehicle manufacturing level is fully achievable

6. A Proportionate Regulatory Approach: Exemption for Connected Vehicles

In light of the technical realities and consumer choice landscape, Transatel recommends that connected vehicles be exempt from end-user switching obligations.

Such an exemption would:

- avoid unnecessary and costly redesigns for European automotive manufacturers,
- preserve the availability of optional in-car Win-car WiFi for consumers,
- ensure that regulatory objectives are met in a proportionate and effective manner.

Conclusion

Transatel encourages policymakers to adopt an approach that recognises the unique architecture and safety requirements of connected vehicles. By providing an exemption from end-user switching obligations and relying instead on well-established vehicle manufacturers' level eSIM switching mechanisms, the European Union can support competition, innovation, and consumer choice without imposing disproportionate burdens on the automotive sector.

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Should BEREC require any additional information or clarification on any elements set out in Transatel's response, please do not hesitate to contact:

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About Transatel

Transatel is a global cellular IoT connectivity solutions provider and a leading Mobile Virtual Network Operators Enabler (**MVNE**) with over 120 MVNO managed on its own full core network. A Pioneer of M2M connectivity, Transatel simplifies global IoT deployments through a single integration to its connectivity management platform by leveraging LTE-M, 3G, 4G, and 5G network access agreements with 250+ MNOs. Today, Transatel's SIMs and eSIM securely connects millions of vehicles, industrial and consumer devices to public and private cellular networks across the world for clients such as BMW, Airbus, Worldline, Stellantis, and Jaguar Land Rover. Transatel also provides global cellular data connectivity for international travellers and distributed workforce through its Ubigi eSIM solution.

Yours sincerely,

[redacted]

[redacted]
Head of Policy and Regulation