

BEREC's position on information requests and geographical surveys of broadband networks of the DNA

2 June 2026

Key messages

- BEREC strongly supports the goals of simplification and harmonisation of sectoral reporting obligations but at the same time highlights the importance of data for effective market monitoring and better regulation.
- However, a rushed broad-brush approach to the simplification and harmonisation of data reporting may risk undermining the effective implementation of regulation, while also leading to increased costs and administrative burden both for public authorities and stakeholders.
- As alternative solutions, BEREC commits to develop a simplification roadmap, work on the harmonisation of NRAs' regular market monitoring and explore approaches to increase efficiencies.
- The geographical surveys indicators should be reviewed to promote simpler and comparable metrics, in line with the BEREC's Guidelines ([BoR \(26\) 73](#)).

Commission proposal

This short paper analyses the DNA's proposals regarding the: i) provision of information to public authorities (Article 181); ii) harmonised information requests and reporting (Article 182), and iii) geographical surveys of network deployments (Article 183)¹.

The DNA largely maintains the EECC provision of information regime with some additional important novelties:

1. New NRAs' responsibility to collect data on network resilience and sustainability and to verify security-related authorisation conditions.
2. Request for NRAs to ask for information on the general authorisation, rights of use and specific obligations no more than once per year.
3. Strong harmonisation of NRAs' information requests² within a year after entry into force of the DNA by means of BEREC guidelines (which should cover the scope, timing, frequency and format of reporting requests as well as the information collection procedures and common templates) and possible EC implementing acts. Harmonisation³ would, in principle, only apply to information requests that are systematic and regular in nature (recital 379).
4. Expansion of the scope of geographical surveys of broadband networks requires a more ambitious data collection⁴ and new applications for market analysis and

¹ Aspects related to sustainability, cybersecurity and market analysis procedures are not addressed in this short paper as they are covered in the dedicated BEREC short papers for each of these topics.

² Due within a year after the entry into force of the DNA.

³ Or at least, related BEREC Guidelines.

⁴ It adds new data requests regarding premises connected (connectivity from the first distribution/concentration point to the home) and in service (adoption) and requires distinguishing—where relevant—between business, residential and public-administration segments. The draft DNA also requires mandatory collection of data regarding network forecasts, whilst this was optional in the EECC.

copper switch-off plans. These surveys must be carried out by NRAs or OCAs⁵ within 12 months from the entry into force of the DNA, at the same time when BEREC must issue related guidelines. Recitals 380-391 introduce further technical and operational concepts.

BEREC's assessment

i. NRAs to request information no more than once per year

BEREC fully recognises and supports the value of simplification and reduction of unnecessary administrative burdens. In this context, **BEREC is committed⁶ to contributing by examining BEREC's and NRAs' data collection practices and exploring ways to reduce administrative costs and burdens for operators and authorities while preserving the monitoring and regulatory value together with usability of the data, especially in a context where some indicators may not be as relevant as in the past, due to the evolution of the market.**

To achieve these objectives, BEREC's involvement is indispensable, as any simplification should be carefully designed to ensure that it does not hinder the effectiveness of regulatory outcomes. Moreover, simplification should be aligned with, rather than override, the principles of good regulation.

The regulation of electronic communications markets is inherently evidence-based and requires data-driven decision-making. Data underpin market analyses and the assessment of competitive dynamics, the identification of market failures and remedies to be considered. Knowing market dynamics well and in a timely manner ensures that regulatory measures remain proportionate, appropriate, targeted and objectively justified, in line with the principles of Better Regulation⁷.

A lack of clarity on the exact scope of the limitation to request information more than once per year is noted, in particular as regards the specific activities which would be covered by the terms: "general authorisation, rights of use and specific obligations". Given the exhaustive list set out in Article 181 (3), these terms could be interpreted as encompassing any requirement issued for the implementation of the DNA. Furthermore, BEREC finds recital 379 unclear and open to interpretation.

If not carefully delineated, a limit on NRAs' information to one data point per year and indicator could constrain the ability of NRAs and BEREC to carry out their core activities and would raise concerns. Namely, this provision may entail the following drawbacks:

⁵ Unlike the EECC, they may not be carried out jointly by both authorities.

⁶ BEREC Strategy 2026-2030 commits to promoting the minimization of administrative burden for stakeholders and the harmonisation of data collections across the EU, while strengthening the internal market. See also, in particular the work for the roaming data collection aimed to simplify the data collection template and reduce regulatory burden.

⁷ Even where some electronic communications markets are deregulated, ongoing monitoring remains necessary and data-dependent. Monitoring market developments require regular access to reliable information. Deregulation does not eliminate the need for data but rather presupposes it as a prerequisite for informed oversight and timely intervention should market conditions deteriorate.

- **Reduce the ability of NRAs to monitor market developments and access timely data**, ultimately hindering the early identification of market failures and the effective handling of regulatory issues, potentially leading to delays in the adoption of decisions. This is especially troublesome in electronic communication markets, which are highly dynamic and characterised by technological change⁸.
- **Jeopardise meeting reporting obligations from the NRA to other national authorities and international organisations** (including the EU Institutions), whose data requirements follow their own planning and calendar⁹.
- **Reduce the usefulness of publicly available NRA data, which fulfils a role in providing for transparency.**
- **Increase the regulatory burden for providers and public authorities.** In the absence of regular data, ad-hoc data requests would increase to make up for missing insights. Moreover, these less structured and unpredictable requests would be more costly to comply with for providers¹⁰ and NRAs than existing recurring ones, which are often automated, with very limited human intervention, which is not feasible for ad hoc requests.

ii. Harmonisation of NRAs' information requests

BEREC shares the ambition to harmonise data collections, where **possible**, while remaining mindful of the costs associated with adapting existing data frameworks. Greater harmonisation enhances the comparability of indicators across Europe, thereby enabling more robust cross-country analysis and benchmarking. For the harmonisation of data requests to effectively support simplification and reduce compliance costs, it should be carried out in a consistent, organised, **and targeted manner**.

Thus, it is indispensable to carefully identify which areas and which data would genuinely benefit from harmonisation and carefully assess how NRAs can implement it consistently and flexibly. Following all of the above, BEREC welcomes the decision to limit the scope of the BEREC Guidelines on harmonisation to **“relevant topics”**.

Generally, any **harmonisation efforts should be properly coordinated with NRAs and supported by EU funding** to ensure that the data collected is proportionate and relevant to the regulatory tasks. BEREC's Guidelines, rather than EC implementing acts which may be established with insufficient NRA involvement, are best placed to ensure such coordination and that implementation costs do not outweigh overall benefits.

⁸ These limitations are particularly significant in markets undergoing technological or structural transition, such as the shift from copper to fibre, the evolution from 4G to 5G. In such context, the pace of change is just as important as the outcome. Data based solely on annual figures would fail to capture intermediate stages and may lead the NRA to intervene too late. Moreover, some indicators may have reached a stable situation in some Member States but can still evolve rapidly in others.

⁹ Competition policy, budgetary planning, funding instruments and crisis response mechanisms often operate on quarterly or half-yearly timeframes. The fact that NRA data is only available on an annual basis may reduce the inter-institutional usefulness of this information and hinder coordination between public bodies with complementary responsibilities. On top of this, there are reporting obligations to international organisations (OECD, ITU, etc.).

¹⁰ And more costly to verify for authorities, since dense time series are important to identify seasonal patterns, detection of discontinuities in data submissions and identify anomalies.

In addition to considering harmonisation measures for existing data collections, harmonisation would be particularly effective in relation to new data collection fields and, thus, should be prioritised before each Member State develops its indicators, for example, in relation to any new task for NRAs introduced in the DNA proposal.

iii. Geographical surveys indicators

While the DNA is guided by the objective of simplification, data collection in relation to geographical surveys is considerably expanded. The merits and appropriateness of these initiatives would benefit from careful assessment, notably by considering the actual use and proportionality of such mandatory information. Building on BEREC's recent analysis¹¹, **fewer and simpler metrics should be promoted in this area.**

BEREC also wants to emphasise that the geographical surveys should be built on the existing data sources and well-established guidance as provided by BEREC in its updated Guidelines on Geographical surveys of network deployments. Any additional data collection would increase administrative costs for NRAs and operators, requiring additional validation processes and possibly the development of new software solutions.

Namely, information on **premises connected** is difficult to obtain¹² and the usefulness of this intermediate supply-side connectivity metric which reflects final drop connections, remains unclear. Particularly since authorities already hold information on premises passed, which is considered sufficient to support several regulatory tasks, including coverage mapping and rollout monitoring. Thus, at present, NRAs may consider the collection of this data disproportionate and of limited practical value, especially in a competitive market. In BEREC's view, the DNA should therefore not mandate the collection of this information but rather include it on an optional basis.

Premises in service (understood as "active lines") is regarded as a useful indicator. However, it should not be mandatory to map this information at the address or within very small grids, as in many cases, more aggregated data (e.g. municipality or province) would be sufficient for regulatory purposes¹³.

The collection of **performance metrics** has proven complex, especially with regard to expected peak-time speeds. These methodological challenges persist, as reflected in the latest BEREC draft guidelines, which classify these indicators as optional. Alternatives to these metrics could be provided by BEREC, involving stakeholders in the definitions.

BEREC welcomes the inclusion in the draft proposal of a definition of **premises passed**. However, this definition would benefit from some technical adjustments to ensure that

¹¹ BoR (26) 73 Updated BEREC Guidelines on Geographical surveys of network deployments, 2.06.2026, see: [link](#).

¹² These are also associated with the difficulties in finding an operational definition of "premises connected at a building level", aggravated by the heterogeneity of network models currently available on the market, where different technologies and operators reach the building via different technical architectures. Note also that premises connected at very granular levels may not be readily available from operators.

¹³ Note also that readiness and take-up data at very granular levels may not be readily available or consistently defined across operators.

the concept reflects reasonable technical feasibility¹⁴ and avoid factors beyond the operators' control. Also, it should be noted that it is not always possible to identify the type of premises (residential, business or public segments, notably for micro and small enterprises, where such categorisation is not always clearly identifiable), which challenges the recording of this qualifying data.

In this context, for the successful implementation of geographical surveys in the context of the DNA, it would be useful for Article 183 to explicitly establish a legal basis enabling NRAs to access the granular information needed for conducting such analyses, such as household data, address databases, or information on the type of premises. These data, sometimes held by national statistical offices, constitute a key input for geographical surveys.

Finally, BEREC considers that information on network forecasts should also be considered optional, rather than mandatory, since this is an onerous and resource intensive task that NRAs should undertake only whenever there is a specific need for the information.

iv. Scope of geographical surveys

Recitals 380-391 introduce a number of technical and operational concepts that go well beyond the scope of Article 183 such as: i) continuous mapping network deployments based on an APIs-based data ingestion model, with the aim to create a “real-time digital twin” of EU connectivity; ii) highly granular socio-economic microdata (such as household composition, age structure and disposable income as well as poverty indicators); as well as iii) detailed information regarding physical building characteristics (including year of construction, dwelling type and tenancy status).

v. Timeline of BEREC guidelines and geographical surveys

The DNA requires BEREC to adopt guidelines on Article 183 within 12 months of the entry into force of the DNA. This deadline coincides with the timeframe for conducting the first geographical survey under Article 183 by NRAs/ OCAs, as well as for publishing the associated public report analysing the survey results in order to determine whether there is a need to carry out a market review pursuant to Article 183(12). **These activities are inherently interlinked and need to be properly sequenced;** they cannot realistically be carried out simultaneously without risking inconsistencies or shortcomings in their implementation.

¹⁴ Footnote 10 in BoR (20) 42 qualifies that external, non-technical factors, such as delays from the end user side, delays arising from operator administrative reasons, or delays due to extreme weather conditions, should not be taken into consideration in the four-week period that qualifies premises passed. See BoR (20) 42 BEREC Guidelines to assist NRAs on the consistent application of Geographical surveys of network deployments, 5.03.2026, see: <https://www.berec.europa.eu/en/document-categories/berec/regulatory-best-practices/guidelines/berec-guidelines-to-assist-nras-on-the-consistent-application-of-geographical-surveys-of-network-deployments>

Alternative proposals:

1. Clarify the scope and the perimeter of application of the request for NRAs to ask for information on the general authorisation, rights of use and specific obligations no more than once per year (Article 181.7), to avoid adverse effects on the NRAs' ability to source specific information and with higher frequencies when this is necessary and proportional for their tasks.
2. Mandate BEREC to develop guidelines on simplification, with a view to establishing a clear simplification agenda, delineating its scope and calendar, as well as approaches to increase efficiencies¹⁵.
3. Maintain BEREC's coordinating role in the harmonisation of regular market monitoring NRA data (including an appropriate level of granularity).
4. Mandate BEREC to develop harmonised indicators in relation to new data collection fields. First, for example, in relation to new tasks for NRAs introduced in the DNA.
5. Review the geographical surveys indicators and promote simpler and comparable metrics in this area following BEREC's assessment and well-established practice among member states.
6. Clarify the scope of the geographical surveys in the recitals, carry out a proportionality assessment and remove recitals that go beyond the legal basis of Article 183 to avoid unnecessary ambiguity and legal uncertainty.
7. Formalise the legal basis for NRA's rights to access data which is necessary to fulfil their obligations under Article 183 from national statistical offices.
8. Sequence properly the elaboration of BEREC's guidelines and the delivery of the geographical surveys.

¹⁵ BEREC could provide guiding principles by assessing not only which data requests could be made less frequently and under what conditions, but also how data collection and data verification processes may be further improved by NRAs and by BEREC itself. Such analysis will also consider IT tools to enhance efficient and automatic data collection.