

**BEREC summary report of the BEREC external
workshop on accessibility of electronic
communication services**
2026 June 9, Brussels

1 October 2026

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Introduction

The Electronic Communications Code (Directive (EU) 2018/1972, EECC) aims to ensure the provision of affordable, publicly available services of good quality across the EU, through effective competition and choice, and to address circumstances where the needs of end users are not met. This includes ensuring that end-users with disabilities can access services on an equivalent basis with others.

BEREC has consistently focused on empowering and protecting end-users. While digital innovation and competition among digital service providers have strengthened end-user empowerment, regulators continue to focus on and play an important role in ensuring consumer transparency and digital inclusion.

As June 2026 marks one year since the application of the European Accessibility Act (Directive (EU) 2019/882, EAA), this BEREC workshop provided a timely forum to reflect on the progress achieved and to discuss the next steps in advancing accessibility in electronic communications (ECS) and digital services. Promoting accessibility for all consumers is a key priority in fostering positive user experiences.

The workshop brought together representatives of end-users, national regulatory and supervisory authorities, market stakeholders, and academia to exchange views on the implementation of the EAA so far and its practical implications.

Through a multi-stakeholder dialogue, participants explored the experiences and needs of end-users, supervisory and enforcement approaches across jurisdictions, market-led technical and operational solutions, as well as some current academic research on digital inclusion and innovation, including the use of AI-based accessibility tools.

By fostering discussion across these different perspectives, the workshop aimed to support the sharing of best practices, identify challenges and opportunities, and strengthen cooperation among stakeholders. The discussions intended to contribute to the development of an inclusive and future-proof digital ecosystem, ensuring that accessibility remains an integral part of innovation and market development.

BEREC continues its work to promote choice and empower end-users, enabling consumers including people with disabilities to make better-informed decisions.

Workshop structure

The workshop was structured into four key sessions¹:

1. Session 1 – End-user perspective.
2. Session 2 – Authorities' practices.
3. Session 3 – Market views.
4. Session 4 – Academia's insights.

¹ Detailed agenda is in Annex I.

BEREC points out that the workshop was well attended, with more than 160 onsite and online participants and 16 speakers throughout the 4 sessions. The biographies of the speakers are included in Annex II.

BEREC takes the opportunity to thank the presenters and participants for their engagement and valuable contribution to the discussions on the topic. The slides from the workshop are set out on the BEREC website².

Opening of the workshop

Alejandra de Iturriaga Gandini. Opening Speech

The BEREC Incoming Chair 2027, Alejandra de Iturriaga Gandini, delivered the opening speech of the workshop, reflecting on the central role that end-users play in BEREC's work. She reiterated that empowering end-users is one of BEREC's strategic priorities, as reflected in the work carried out by the BEREC End-Users Working Group.

Referring to the year since the implementation of the European Accessibility Act (EAA), she indicated that the workshop was a good opportunity to discuss the progress made so far, but also to consider the tasks that must be addressed in the future to ensure that digital connectivity is truly open to everyone.

The ultimate goal of the regulation, she said, is people. She specifically referred to communications services as essential tools for achieving everyone's participation in society. According to the BEREC Incoming Chair 2027, access to communications services is a prerequisite for achieving equal opportunities and becomes a fundamental issue related to dignity, autonomy, and social inclusion.

Mrs. de Iturriaga highlighted one of the objectives of the EAA: to expand the availability of services and products for people with disabilities. She also mentioned the role that the EAA plays in helping to create a more coherent framework across the European Union, encouraging accessible design, and supporting a digital environment in which innovation and inclusion evolve together.

After thanking the workshop participants (end-users, market stakeholders, academia, and national authorities), she concluded her remarks by emphasising that accessibility is a shared responsibility and a shared opportunity, and that this multi-stakeholder approach is essential if progress is to be made from legal principles to real-world impact.

² <https://www.berec.europa.eu/en/events/berec-external-workshop-on-accessibility-of-electronic-communications-services>

Introduction to the EAA: Hannele Lahti - DG Connect, European Commission

The European Commission representative, Hannele Lahti (DG Connect), sought to elaborate on the implementation of the EAA and what has been put into practice to date to ensure that products and services are accessible by persons with disabilities.

Returning to the comments made by Mrs. de Iturriaga, Lahti reiterated that the Act supports fundamental rights, but also, she added, the internal market by harmonising rules and reducing fragmentation.

Ms Lahti specifically cited some steps taken so far, such as the appointment by Member States of authorities for market surveillance of products and for the compliance of services, and the creation by the European Commission of the European Accessibility Act Expert Group.

She also referred to the request issued by the Commission for European organisations to establish harmonised standards to support the implementation of the Act. While she did not cite the six standards, she did refer to the harmonised standard for the interoperability of emergency communications, whose drafting deadline is early next year. She also mentioned the accessibility requirements for ICT products and services, which already exist but need to be updated to address the accessibility requirements of the directive.

Regarding this last point, she indicated that the participation of electronic communications providers in the work on standards is essential.

Finally, she referred to the importance of ensuring that communication services are reliable and usable for everyone. To achieve this, she noted, the rules of the European Accessibility Act (Directive ((EU) 2019/882) must be transposed in the Member States. Regarding the status of the transposition, she said that all Member States have declared their transposition in the last year. However, according to Ms Lahti, the Commission did issue infringements for incomplete transposition. Twelve infringements have been closed, but there are still 14 ongoing infringements, and even a court case regarding the failure to notify from two years ago. At the same time, she concluded, the Commission is having meetings with Member States to support the transposition, and the correctness of the national measures is being checked in parallel.

Session 1 – End-users' perspectives

This session delved into the accessibility topic by focusing on the end-user perspective and explored real-world challenges and practical solutions for digital accessibility. The speakers shared first-hand insights about the daily barriers faced by persons with disabilities and specific accessibility needs when interacting with electronic communications and digital services, as well as effective tools, resources, and support strategies that empower end-users including those with disabilities to overcome them.

The session was moderated by Indre Jurgelioniene, co-chair of the BEREC End-User Working Group.

Srikar Govindaraju – BEUC

The BEUC presentation considered what the DNA means for end-users. Srikar Govindaraju set out that end-user rights in telecoms are necessary. He referred to the historical need for robust consumer protection in the telecommunications sector, which has been one of the worst performing services markets for end-users, where over eighty-five per cent of identified problems result in official customer complaints. He set out that since the introduction of the EECC, satisfaction levels have risen, with two-thirds of end-users satisfied with internet download speeds and improvements in contract transparency. However, BEUC warns that potential risks for end-users remain, such as those relating to rapid market consolidations that reduce competition, the fostering of local monopolies that drive up prices, and the degradation of service quality. Additionally, the lack of targeted investments risks delaying network deployment in remote areas, further deepening the digital divide.

In relation to the DNA, BEUC strongly opposes the principle of full harmonisation if it forces Member States, such as Germany, to wind back their consumer protection laws. Instead, the final text should strengthen transparency requirements and make it easier for end users to switch providers, particularly regarding early contract terminations and fibre network upgrades. Regulatory enforcement should also be improved by granting oversight powers to national regulatory authorities, while ensuring effective redress for end-users including channels for citizen complaints and civil law remedies to seek financial compensation.

Daniel Casas – European Disability Forum (EDF)

Daniel Casas emphasised that the EAA and the DNA complement each other, but sector-specific provisions for end-users with disability in the DNA are still needed. A concern stems from the flexibility granted to Member States, repeating mistakes arising from the EECC where regulatory freedom led to highly fragmented service implementation across the EU. Fragmentation leaves people with disabilities facing challenges, such as, high usage costs and inaccessible electronic communication services.

To address these barriers, EDF proposes the maintenance of amendments to the universal service provisions in Articles 87, 88, and 90, insisting that affordability measures expand to mobile telephony and representative non-governmental organisations while allowing Member States to keep more ambitious national protections. EDF proposes extending affordability measures to voice communication services at a non-fixed location and non-governmental organisations. Regarding equivalent access under Article 111, EDF consider that relay services must become legally mandatory on a 24/7 basis across all Member States, with explicit structural alignment to the EAA. Furthermore, Article 106 must enforce EAA compliance for national emergency numbers and tighten rules for Total Conversation features, while clarifying how emergency mobile applications integrate with the European Digital Identity Wallet. Finally, service providers must be mandated to deliver comprehensive contract information by default rather than only upon an explicit customer request.

EDF proposes that DNA Article 104 proposals, regarding free of charge access to missing children and help hotlines for end-users with disabilities, establish a link with the EAA requirements to ensure access via RTT (Real-Time Text) and TC (Total Conversation).

In conclusion, EDF proposes that the EAA provisions apply not only to contract information and transparency, but also should extend to Article 111 (Equivalent Access), Article 185 (consultation with interested parties), and Article 188 (out of court dispute resolution).

Lidia Best - the European Federation of Hard of Hearing People (EFHOH) and Delphine le Maire - European Union of the Deaf (EUD)

The third and final presentation of Session 1 provided an overview of relay services across Europe. It was based on the most recent data collected by the European Union of the Deaf (EUD) and the European Federation of Hard of Hearing People (EFHOH), drawing on a survey directed at relevant stakeholders in this field. The presentation covered both Video Relay Services (VRS), presented by Delphine le Maire from EUD, and Text Relay Services (TRS), presented by Lidia Best from EFHOH.

The presentation focused on key findings related to service availability, different modalities, access to emergency services (112), user fees, time limitations per user, waiting times, availability for users living abroad, and interoperability between systems and countries.

The preliminary findings of this survey indicate that VRS is available in more European countries than TRS, although neither service is typically offered on a 24/7 basis. Both VRS and TRS are generally free of charge for users. Time limits on calls are more common within VRS than TRS, though there is significant variation in these limits across countries. Waiting queues were identified as a widespread issue affecting both types of relay services. Interoperability between systems remains very limited, and cross-border access is largely absent. In addition, access to emergency services (112) through both VRS and TRS is restricted and inconsistent.

It was emphasised that these findings are preliminary. Further follow-up work is required, and a more comprehensive report, which is expected later in 2026, may refine and expand upon the conclusions presented at the workshop.

Session 2 – Authorities' practices

This session explored the evolving regulatory landscape and practical strategies for ensuring inclusive access to electronic communications services. Participants discussed the diverse approaches taken by NRAs, examining specific use cases and national initiatives that have successfully lowered barriers for users with disabilities. By discussing international frameworks and emerging benchmarks, the session showed authorities' approach in ensuring that digital innovation benefits all citizens equally and fosters a truly inclusive market.

The session was moderated by Dr Dominika Beléndesi, BEREC, NMHH.

Laurence Nivot, Cullen International

Laurence Nivot presented a comprehensive overview of the implementation and enforcement of the EAA at the national level. Despite the transposition deadline having passed in June

2022, a substantial number of Member States missed it, and by January 2026, the European Commission still identified transposition gaps in nine countries. In a recent survey covering 12 Member States, Cullen International drew several important conclusions regarding accessibility. The number of national authorities dealing with the accessibility of electronic communications products and services is very high, reaching up to 40 across the surveyed countries, often involving regional authorities. Furthermore, while the telecoms NRA typically assumes responsibility for service compliance, the authority responsible for product compliance can often differ, though countries like Germany and Spain have recently set up national coordination bodies. Regarding enforcement, despite varying levels of potential fines - such as up to €900,000 for service failures in the Netherlands or €100,000 in Germany - no authority has yet publicly reported the imposition of fines. Currently, authorities are actively issuing guidance to facilitate compliance with accessibility requirements, while some Member States are already seeing ongoing supervision actions or court proceedings initiated by associations against non-compliant e-commerce websites.

Lisa Larsson Falk, PTS, Sweden

Lisa Larsson Falk detailed Sweden's approach to inclusive electronic communications and EAA supervision. She emphasized that accessibility is increasingly critical due to growing digitalization, an aging population, and persistent knowledge gaps where accessibility is often considered too late in the development process. PTS conducts risk-based and planned supervision, where complaints and reports directly guide their supervisory priorities, leading to corrective actions and potential fines if requirements are not met. Ms Falk outlined significant challenges for operators, including a regulatory framework that is difficult to interpret and standards that are still under development. The PTS reported that they have produced a practical guide on the EN 301 549 standard, which is available in both Swedish and English and features a filter function to help identify relevant requirements. Furthermore, they are conducting social media campaigns and various awareness initiatives to increase knowledge among both economic operators and the general public. To date, the authority has registered between 100 and 115 complaints, and they have the power to impose fines ranging from 1 to 10 million, with several supervisory proceedings currently underway. Furthermore, PTS is focusing on the procurement of relay services, providing expertise to ensure accessibility standardization - particularly regarding RTT and Total Conversation - to guarantee consistency.

Tanja Zaninović, HAKOM, Croatia

Tanja Zaninović outlined the future of accessibility in Croatia, noting that HAKOM assumed the role of Digital Services Coordinator in 2024. Her presentation focused on the transition from paper-based regulations to practical, enforceable digital applications aligned with EU directives. Croatia is actively harmonizing its accessibility legislation through a structured three-stage progress plan: drafting the law, establishing advisory mechanisms for children, seniors, and persons with disabilities, and finally achieving full alignment with EU standards. HAKOM acts as the competent body for market surveillance across electronic communications services, e-books, dedicated software, and radio equipment products. Ms Zaninović highlighted impactful metrics, such as, a new universal service standard ensuring a minimum internet speed of 14 Mbit/s for all users, including those in rural areas. Collaboration forms a core pillar of their strategy, with long-term partnerships established with the Association of Persons with Disabilities and academia, notably the Faculty of Electrical

Engineering and Computing (FER), to bridge research and innovation. Additionally, HAKOM drives digital innovation through dedicated applications (like the KVIZ app), webinars, and their annual Accessible Future Conference, ensuring that structured advisory bodies embed lived experiences directly into regulatory decision-making.

Dora Di Napoli, AGCOM, Italy

Dora Di Napoli presented the Italian experience, detailing the robust evolution of consumer protection and accessibility regulations spanning from 2007 to 2024. AGCOM has progressively expanded its beneficiary categories to include deaf and blind persons, users with severe mobility impairments, and minors with disabilities. Operators are mandated to provide significant measures, including a 50% tariff discount on all fixed-network broadband data offers and across three specific data tiers (ranging from 20GB to unlimited) for mobile networks, all without relying on public funding mechanisms. Consumer protection requirements help enforce transparency through dedicated, accessible web pages, the provision of accessible billing in assistive-technology compatible formats upon request, a free digital assistance channel prioritized for disabled users available from 08:00 to 24:00, and the option to designate a third party to manage payments and the entire contractual relationship on behalf of the user with disabilities. Regarding the EAA's implementation, the Italian regulatory framework relies heavily on recent legislation and inter-agency co-operation, with AgID as the supervisory authority for services. The AGCOM explained that last year the AgID guidelines were published, which effectively convert the requirements of the EAA into operational obligations and technical standards for economic operators. These guidelines implement accessibility principles through the 'by design' approach, which integrates accessibility throughout the entire service lifecycle, and the 'by default' approach, which ensures that services are built upon already-accessible components and templates from the start. By adopting these methods, operators can minimize the need for costly post-production remediation. The framework is further supported by technical tables, comprehensive FAQs, and a dedicated digital reporting platform for users.

Session 3 – Market views

This session brought together market perspectives on the new accessibility legislation, offering practical insights into how industry actors are preparing to meet the requirements. Speakers shared some technical solutions, implementation approaches, and operational strategies currently being developed, while also reflecting on the main challenges encountered in practice. The discussion provided an opportunity to better understand market expectations and to hear the key messages that industry stakeholders wish to convey to regulators and supervisory authorities as the new framework is put into effect.

The session was moderated by Dónal Rice, BEREC, ComReg.

Angela Coriz, Connect Europe

Angela Coriz presented the perspective of European telecommunications operators, outlining their experience of implementing the EAA during its first year of application. Her presentation

focused on the principal obligations for electronic communications service providers, including accessible customer information, RTT, Total Conversation and accessible emergency communications.

Ms Coriz explained that operators have invested significantly in upgrading their networks to support RTT using Voice over LTE (VoLTE) and Voice over Wi-Fi technologies. While substantial progress has been made, implementation has depended on coordinated action between network operators, device manufacturers and Public Safety Answering Points (PSAPs). Challenges remain where older devices do not support RTT or emergency services have yet to implement the necessary capabilities.

Three case studies illustrated different approaches to implementation. Telecom Italia described how accessibility has been embedded within corporate governance through revised policies, staff training, accessibility assessments, procurement requirements and accessibility-by-design principles. Telefónica outlined its experience deploying RTT across its network and identified integration with emergency communications as the next key phase of implementation. VodafoneZiggo demonstrated how improvements to SIM card packaging, colour contrast and compatibility with assistive technologies can enhance accessibility through relatively simple product redesign.

Ms Coriz concluded that telecommunications operators have made considerable progress in implementing the EAA. However, ensuring that RTT is fully supported across emergency communications remains a priority and will require continued collaboration across the telecommunications eco-system.

Sabine Lobnig, Mobile Wireless Forum (MWF)

Sabine Lobnig presented the perspective of device manufacturers through the Mobile & Wireless Forum (MWF), with particular emphasis on the importance of accessible consumer information and the practical challenges associated with implementing the EAA.

A central focus of her presentation was the Global Accessibility Reporting Initiative (GARI), an industry-led database that provides detailed information on the accessibility features available in mobile phones, tablets, wearable devices and smart televisions³. The database currently contains information on almost 200 accessibility features and is designed to help consumers identify devices that best meet their individual accessibility requirements. Ms Lobnig noted that many accessibility features have existed for several years, but consumers are often unaware of them or do not know how to activate and use them. She argued that accessible information and user guidance are therefore essential components of achieving meaningful accessibility.

The presentation also highlighted a number of implementation challenges. While the EAA seeks to harmonise accessibility requirements across the European Union, Ms Lobnig asserted manufacturers currently face differing reporting mechanisms, regulatory processes and compliance expectations across Member States. This fragmentation was identified as

³ <https://www.gari.info/>

creating unnecessary administrative burdens and increasing the complexity of compliance activities.

Ms Lobnig noted that manufacturers generally support the development of harmonised standards but emphasised that the timing of their publication presents practical implementation challenges. She explained that mobile devices typically have development cycles of approximately eighteen months and argued that revised standards should therefore be accompanied by appropriate transition periods to allow new requirements to be incorporated into future product generations. She stressed that this should not be interpreted as delaying compliance with the EAA itself. Rather, manufacturers remain responsible for complying with the legislation in the absence of harmonised standards, although the lack of agreed technical standards creates uncertainty regarding how compliance should be assessed by both manufacturers and market surveillance authorities. She suggested that a pragmatic and cooperative approach between regulators and industry would be beneficial until harmonised standards are available.

She concluded by emphasising that the objective of the EAA should extend beyond regulatory compliance to ensuring that accessible technologies are both available and easily understood by consumers. Continued engagement between manufacturers, regulators and disability organisations was identified as essential to achieving that objective.

Peter Lonergan, European Emergency Number Association (EENA)

Peter Lonergan presented the perspective of the European Emergency Number Association (EENA), focusing on the current state of accessible emergency communications across Europe and the future direction of emergency services.

He began by outlining developments relating to the proposed Digital Networks Act, noting that while the current proposal contains relatively limited accessibility provisions, EENA supports stronger requirements relating to sign language relay services and Total Conversation. He also highlighted proposals that could enable future emergency communications through applications linked to the EU Digital Identity Wallet, potentially providing more accessible and feature-rich communication channels.

The principal focus of Mr Lonergan's presentation was EENA's Accessibility Report Card⁴, which assesses the implementation of accessible emergency communications across Member States. The findings demonstrated that progress has been made but remains uneven. The report card indicates that that, as of June 2026, only Ireland and Sweden had implementations of RTT within emergency communications, while most other Member States intend to introduce RTT by June 2027. However, implementation has generally progressed more slowly than anticipated, with delays evident across many jurisdictions.

Mr Lonergan also examined alternative emergency communication channels, including SMS services, dedicated emergency applications and web-based solutions. Although these services are becoming increasingly available, their functionality varies significantly between Member States, particularly regarding caller location, roaming support and interoperability.

⁴ <https://eena.org/knowledge-hub/accessibility-report-card/>

A significant theme of the presentation concerned the future role of video in emergency communications. Some emergency service organisations are preparing to introduce live video capabilities that can be activated by emergency call handlers. While these systems are primarily intended to improve situational awareness during emergencies, they also have the potential to facilitate wider implementation of Total Conversation services. Mr Lonergan concluded that, while important progress has been achieved, continued investment, greater interoperability and increased awareness will be required to ensure that accessible emergency communications are consistently available throughout Europe.

Session 4 – Academia's insights

This session brought together academic perspectives on the evolving accessibility framework, highlighting the links between accessibility and the business ecosystem. Speakers explored current research on digital inclusion, emerging trends in user needs and access barriers, and the ways in which innovation, including AI solutions, can support access to electronic communication services. The discussion proposed insights into how research and innovation can complement regulatory and market efforts in shaping a more inclusive digital environment.

The session was moderated by Indre Jurgelioniene, a co-chair of the BEREC End-User Working Group.

Dr Jurgita Butkevičienė, PhD, Vilnius University, Lithuania

Ms Butkevičienė, being a researcher and educator, highlighted the importance of business research and accessibility, the changing focus of research approach, and the link between accessibility and the entrepreneurial ecosystem.

Ms Butkevičienė set out that social exclusion limits potential growth while inclusion strengthens and enriches economies and societies. And while digitalisation and ageing of societies have both been ongoing trends for years, the expansion of AI amplifies the importance of digital accessibility. Another interesting aspect that Ms Butkevičienė pointed out is how understanding accessibility in research itself has changed over time. First, research interpreted accessibility from a medical and social impairment perspective, focusing on the digital divide and limited access to technology. Later on, it gradually gained a more complex and nuanced angle focusing on participation in society and overcoming social, attitudinal, and communication barriers. And while technology, design, regulation, and digital inclusion are all important tools for digital accessibility, she drew attention to entrepreneurial participation. While accessibility research focuses on access and explains who can reach services, entrepreneurial ecosystem models focus more on resources and explaining what resources matter.

As an example, Ms Butkevičienė mentioned that while financial institutions (such as commercial banks) had to introduce accessibility measures for their customers and clients, for example, accessible websites and applications, often they do not execute the same measures internally regarding internal websites and documentation. Thus, institutional change in general is not in place, and many barriers still remain (e.g. where incubators, accelerators, business support systems are not accessible; access to mentoring, advisory services, and ecosystem support will be unequal).

Regarding AI, she argued that it can be both an accessibility enabler, providing more opportunity to more people, but it may create new barriers as well. Thus, accessibility embedded into AI services is key for equal participation and to unlock the full potential of entrepreneurial ecosystems. Ms Butkevičienė believes that accessibility can make our economy and society more resilient through gathering more and more diverse talents and innovative ideas.

Dr Miroslav Vrankić, PhD, University of Rijeka, Croatia

Following the conceptual insights presented by the first speaker, Mr Miroslav Vrankić representing the University of Rijeka, Croatia and the company E-Glas, gave important insights into engineering and research on assistive tools.

Mr Vrankić pointed out that academic research is important for gaining knowledge and learning from each other. However, to make a difference in society, he considers that we need companies creating products and finding their customers. He explained his own path in both these fields and gave a short introduction to their innovations in assistive technology (e.g., speech synthesiser controlled by eye-balls, special computer mouse navigating by lip or head movements, and several special devices and apps for educational needs of disabled students and for sensory therapy).

Mr Vrankić presented an interesting case relating to a patient living with locked-in syndrome (the person cannot speak, cannot move, not even his/her eyeballs, but s/he understands all). With a special communicator device, using the brain waves of the patient and predefined voice prompts, this person with accessibility needs is able to communicate on a basic level.

Zephyr Rankin, East Texas A&M University, USA

After highlighting the opportunities of assistive technologies, the third speaker, Mr Zephyr Rankin, a research librarian and accessibility expert at East Texas A&M University from the U.S., presented some possible barriers of AI accessibility tools.

First, Mr Rankin introduced a broad definition of AI (i.e., all computer programs that perform tasks typically associated with humans) and set out two main AI categories, i.e., analytical AI (for observations and predictions made on more specific datasets) and generative AI (for creating outputs on larger and more complex datasets). He set out that AI is not magic: while it can mimic human thinking, these tools are only algorithms, not brains. Thus, AI tools do not think or process information as humans do, and would have to be checked by a person for effective use.

Second, Mr Rankin presented in summary ten use cases of AI accessibility tools with a short summary of common issues with each of them. For example, web and document analysers are widely-used AI tools. They can create alternative text, captions, and transcripts, while they are able to analyse contrast and heading levels, handle links and navigate. Some analysers will alert for missing accommodation, while others can make automatic adaptations. Besides the advantages, there are some common issues with using web and document analyser AI tools, such as: analysers can alert to some accessibility issues, but they still cannot see everything. Another issue with automatic adaptation is that it uses a different AI tool in the

background that can generate and be prone to other mistakes. Mr Rankin presented and analysed briefly the following ten AI accessibility tools: 1) web and document analysers, 2) text generators, 3) image and video generators, 4) image recognition, 5) facial recognition, 6) speech-to-text, 7) text-to-speech, 8) AI translators, 9) health alert AI, and 10) AI assistants (in general and AI learning assistants specifically).

Third, Mr Rankin highlighted some ethical issues that can arise with AI accessibility tools (such as inaccuracy, bias, and privacy concerns). Regarding inaccuracy, he pointed out that AI does not have knowledge; it replicates patterns while it does not have experience of the context or culture. Besides, AI tools can ignore many concepts and ideas; Mr Rankin highlighted that most generative AI tools were estimated to be trained on about 10% of non-English languages. Concerning bias of AI accessibility tools, studies show systemic bias towards not only languages but social minorities (e.g., colour and ethnicity, ability-disability, and speech patterns). Regarding privacy, Mr Rankin explained that, on the one hand, privacy is protected by law, on the other, AI accessibility tools can provide increased functionality. By way of example, AI accessibility tools can provide personalised assistance for people with disabilities, possibly at a cost of decreased privacy. As he set out, people who need these tools should not have to sacrifice their privacy to be able to access and use them.

Finally, he explained two negative consequences of AI tools. One is over-reliance. Many people without extensive background knowledge will not instinctively recognise inaccuracies and bias, therefore misplacing their trust in the technology. It may cause language flattening (e.g., the “bot accent”). These tools may generate cognitive offloading: persistent AI use has been shown to result in a decrease in critical thinking and creativity. Another negative consequence that Mr Rankin underlined is over-promising by AI tools. The focus of the companies that created many currently used tools is to sell their product, not necessarily to help people with limited resources. He concluded by highlighting the importance of more research, greater use of varied sources and research with independent funding, grant-funded, and peer-reviewed.

Annex I. Agenda of the workshop

Agenda

for the Workshop on accessibility of electronic communications services

One Year of the European Accessibility Act – reflections and the way forward

9th June 2026, Brussels (Belgium)

Location	IRG Secretariat Rue de la Science 14, 3rd floor B-1040 Brussels	
Date & Time	9th June 2026 9:30 – 14:50 CET	

Marking one year since the beginning of application of the European Accessibility Act, this workshop brings together key stakeholders to reflect on progress, exchange experiences, and discuss future priorities for accessibility in electronic communications and digital services. Through a multi-stakeholder dialogue, the event aims to promote practical solutions, shared experience, and stronger cooperation towards a more inclusive digital environment.

09:00 -9:30	Welcoming coffee/tea
9:30 -9:35	Opening speech • Alejandra de Iturriaga Gandini - Incoming BEREC Chair 2027 • Incoming BEREC Chair 2027
9:35-9:40	Introduction to the EAA • Hannele Lahti - DG Connect, European Commission
9:40 -10:30	Session 1: End-user perspectives This session starts delving into the accessibility topic by focusing on the end-user perspective and will explore real-world challenges and practical solutions for digital accessibility. The speakers will share firsthand insights into the daily barriers faced by persons with disabilities and specific accessibility needs when interacting with electronic communications and digital services, as well as effective tools, resources, and support strategies that empower users to overcome them.

	Moderator: Indre Jurgelioniene, co-chair of BEREC End-User WG, RRT, Lithuania • Srikar Govindaraju - BEUC • Daniel Casas – European Disability Forum (EDF) • Lidia Best - the European Federation of Hard of Hearing People (EFHOH) and Delphine le Maire - European Union of the Deaf (EUD) Q&A/Discussion
10:30 -11:30	Session 2 – Authorities' practices This session explores the evolving regulatory landscape and practical strategies for ensuring inclusive access to electronic communications services. Participants will delve into the diverse approaches taken by NRAs, examining specific use cases and national initiatives that have successfully lowered barriers for users with disabilities. By discussing international frameworks and emerging benchmarks, the session aims to identify how authorities can move beyond basic compliance toward a gold standard of accessibility – ensuring that digital innovation benefits all citizens equally and fosters a truly inclusive market. Moderator: Dr Dominika Beléndesi, BEREC, NMHH, Hungary • Laurence Nivot , Cullen International • Lisa Larsson Falk, PTS, Sweden • Tanja Zaninović, HAKOM, Croatia • Dora Di Napoli, AGCOM, Italy Q&A/Discussion
11:30 -12:30	Lunch Break
12:30 -13:30	Session 3 – Market Views This session brings together market perspectives on the new accessibility legislation, offering practical insights into how industry actors are preparing to meet the new requirements. Speakers will share the technical solutions, implementation approaches, and operational strategies currently being developed, while also reflecting on the main challenges encountered in practice. The discussion will provide an opportunity to better understand market expectations and to hear the key messages that industry stakeholders wish to convey to regulators and supervisory authorities as the new framework is put into effect. Moderator: Dónal Rice, BEREC, ComReg, Ireland • Angela Coriz, Connect Europe • Sabine Lobnig, MWF,

	• Peter Lonergan, EENA Q&A/Discussion
13:30-13:45	Coffee Break
13:45-14:45	Session 4 – Academia’s insights This session brings together academic perspectives on the evolving accessibility framework, highlighting the links between accessibility and the business ecosystem. Speakers will explore current research on digital inclusion, emerging trends in user needs and access barriers, and the ways in which innovation, including AI solutions, can support access to electronic communications services. The discussion will also propose insights into how research and innovation can complement regulatory and market efforts in shaping a more inclusive digital environment. Moderator: Indre Jurgelioniene, co-chair of BEREC End-User WG, RRT Lithuania • Jurgita Butkevičienė, Vilnius University, Lithuania • Miroslav Vrankić, PhD, University of Rijeka, Croatia • Zephyr Rankin, East Texas A&M University, USA Q&A/Discussion
14:45-14:50	Closing Remarks BEREC End User Working Group co-chairs

Annex II. Speakers' biographies



Alejandra de Iturriaga Gandini - Incoming BEREC Chair 2027

Alejandra de Iturriaga Gandini is currently serving as Director of Telecommunications and Audiovisual Sector at the Spanish National Commission on Markets and Competition (CNMC). With a strong background in telecommunications regulation and European policy, Ms de Iturriaga Gandini has played an active role in BEREC's work for many years, including serving as a Vice-Chair in 2017, 2021 and in 2025. She actively participates in key international regulatory fora and maintains close collaboration with public and private stakeholders at national and European levels. Alejandra de Iturriaga Gandini has vast experience in the telecommunications and digital policy field. She joined Spain's national regulatory authority almost 30 years ago as Deputy Director and Director of the Legal Department. In 2005, she became Director of the Regulation Department, responsible for checking and supervising market participants' compliance with the regulatory framework, resolving conflicts between operators and developing general regulations and sanctioning procedures. Prior to being at the CNMC, Ms de Iturriaga Gandini was an Associate and Manager at Price Waterhouse Public and Tax Law, S.L., serving as the Head of the Area of Administrative Law, focusing on the utilities sector: telecommunications, transport, electricity and postal services.



Indrė Jurgelionienė, Co-chair of the BEREC EU WG

Indrė Jurgelionienė is a Chief Advisor at the Communications Regulatory Authority of the Republic of Lithuania (RRT). She joined RRT in 2013. Indre has been a co-chair of the End-User Working Group at the BEREC since 2023. Indre has been engaged in various regulatory and consumer protection aspects in the electronic communications and postal sectors. Indre has experience in public policymaking and implementation, including the transposition of European Union legislation into national law and involvement in various national multi-stakeholder projects on both national and international levels.

Indrė holds a Bachelor's degree in Law and a Master's degree in Civil law - from Mykolas Romeris University (Lithuania).



Dr Dominika Beléndesi, BEREC End User Working Group Drafter, NMHH, Hungary

Dr Dominika Beléndesi is an infocommunications surveillance officer at the National Media and Infocommunications Authority (NMHH), responsible for the supervision of the electronic communications sector in Hungary. She has gained professional experience at leading Hungarian and international law firms across various sectors, as well as at public entities. She joined the End Users Working Group (EU WG) in 2025 and wishes to continue contributing to its activities. Dominika holds a Master of Law degree from Eötvös

Loránd University (ELTE) and an LL.M. in Comparative and Hungarian Law from Paris-Panthéon-Assas University (Paris II).



Dónal Rice, BEREC End User Working Group Drafter, ComReg, Ireland

Dónal Rice is the European Accessibility Act (EAA) Implementation Manager, at the Commission for Communications Regulation (ComReg), Ireland. He joined ComReg in 2025 to support establishment of the EAA function. Previously, Dónal set up the National Monitoring Body under the EU Web Accessibility Directive at the National Disability Authority and the Public Sector Equality and Human Rights team with the Irish Human Rights and Equality Commission. Dónal has been an evaluator of accessibility projects on multiple EU research and innovation funding programs and is a lecturer on equality and human right at the Institute of Public Administration. He has advised the International Telecommunication Union Development Sector and the European Commission on accessibility policy. Donal volunteers as a trustee on the Board of Directors of the South Leinster Citizens Information Service.

Dónal holds a MSc in Computing and a Master of Laws (LLM).



Hannele Lahti, Head of Sector End-User rights, DG Connect, European Commission

Hannele Lahti works in the Directorate-General for Communications Networks, Content and Technology of the European Commission. Since 2025, she has been Head of Sector of end-user rights at the Electronic Communications Policy, Implementation and Enforcement

Unit.



Srikar Govindaraju, Digital Policy Officer, BEUC

Srikar Govindaraju is Digital Policy Officer for Telecoms at BEUC, the European Consumer Organisation. BEUC is the Consumer Voice in Europe, representing 42 national organisations in 31 countries. Alongside telecoms policy, Srikar also coordinates BEUC's work on the Digital Omnibus. Before joining BEUC, Srikar worked in a Brussels-based public affairs consultancy on both telecoms and digital policy, and in the government affairs team of an Amsterdam-based global trade association. He holds an LL.M. in International Law from Maastricht University and an LL.B. from the University of Birmingham.



Daniel Casas, Senior Accessibility Policy Officer, European Disability Forum (EDF)

Daniel Casas is Senior Accessibility Policy Officer at the European Disability Forum (EDF), the umbrella organisation that defends the interests of over 100 million persons with disabilities in Europe. His work at EDF focuses on accessibility and freedom of movement,

covering areas and policies such as transport, the built environment, accessibility of goods and services and ICT. Daniel holds a bachelor's degree in Philosophy, Politics and Economics (Spain) and a master's degree in European Integration (Belgium).



Lidia Best, President of European Federation of Hard of Hearing People

Lidia Best is an internationally recognised expert in accessibility, hearing loss inclusion, and disability rights, with extensive experience shaping policy and standards at European and global levels. She serves as President of the European Federation of Hard of Hearing People (EFHOH), where she represents the interests of millions of hard-of-hearing citizens across the European Union and works closely with EU institutions, national governments, and civil society partners to advance communication access, inclusive employment, and equitable hearing care. Lidia is also Chair of the International Telecommunication Union (ITU) Joint Coordination Activity on Accessibility and Human Factors (JCA AHF).



Delphine le Maire, Policy Officer at European Union of the Deaf (EUD)

As a jurist in European Law and International Human Rights Law, Delphine le Maire brings extensive advocacy and research experience across national, European, and global levels in disability and deaf communities. As the European Union of the Deaf Policy Officer, she contributes to the design process of EU policies through policy papers and advocacy work.



Laurence Nivot, Manager at Cullen International

Laurence leads Cullen International's research on consumer protection in Europe, focusing on developments affecting end users of telecoms services. She coordinates analytical reports and country-by-country comparisons on key policy and regulatory issues. Laurence has over 14 years of experience in the telecommunications sector and regularly contributes to discussions on consumer rights and telecoms policy. Laurence holds a master's degree in European Law from the Aix-Marseille University (France). Before joining Cullen International in 2012, she worked for the European Commission Secretariat-General and DG Communication.



Lisa Larsson Falk, Senior Analyst - PTS, Sweden

Lisa Larsson Falk is a political scientist and senior analyst with nearly 20 years of experience in Swedish public administration. She also has extensive experience in EU affairs and accessibility regulation. Lisa works at the Swedish Post and Telecom Authority (PTS), where she focuses on the implementation of the European Accessibility Act, guidance for market actors, and cross-agency coordination related to accessibility legislation. She has broad experience in government assignments, regulatory analysis, stakeholder collaboration, and public sector cooperation. Lisa also serves as an accessibility expert in EU cooperation initiatives coordinated by the European Commission.



Tanja Zaninović, Senior Legal Expert - HAKOM, Croatia

Tanja Zaninović is a Senior Legal Expert at the Croatian Regulatory Authority for Network Industries (HAKOM), where she has been employed since graduating from the Faculty of Law in 2008. She passed the bar exam in 2012 and holds a postgraduate specialist degree in Civil and Family Law Sciences. Her expertise spans electronic communications regulation, RF spectrum management, and public procurement, with a strong focus on digital accessibility and online child protection. She is a frequent speaker and panellist at national and international conferences, dedicated to advancing digital technology accessibility and modern digital functionalities.



Dora Di Napoli, Officer at Consumer Protection Directorate - AGCOM, Italy

Dora Di Napoli is an Officer at the Italian Communications Authority (AGCOM), within the Consumer Protection Directorate, where she has been serving since 2009, following professional experience in the telecommunications industry at Alcatel Lucent. Her professional activity is focused on regulatory and supervisory tasks in the field of electronic communications, notably in relation to quality of service, transparency obligations, universal service provision, and consumer protection. She has been involved in the development and implementation of regulatory frameworks covering areas such as universal service schemes, tariff transparency, billing and charging practices, and value added services, with a particular emphasis on the protection of vulnerable and disadvantaged end users. She has contributed to regulatory policy development and enforcement, including participation—as an AGCOM delegate—in the national technical working group established in the context of the transposition of the European Accessibility Directive into national legislation. Dora Di Napoli holds a Bachelor's degree in Electronic Engineering from the University of Salerno.



Angela Coriz, Policy Officer - Connect Europe

Angela Coriz is a Policy Officer at Connect Europe. She is part of the regulatory and public policy team, and focuses primarily on consumer choice and protection, standards, international affairs, and naming, addressing and numbering.



Sabine Lobnig, Director of Communications at Mobile & Wireless Forum (MWF)

Sabine is the Mobile & Wireless Forum (MWF) Director for Communications. The MWF is the international association of companies with an interest in mobile and wireless communications, including the evolution to 5G and the Internet of Things. One of the MWF's main projects is the Global Accessibility Reporting Initiative (GARI, www.gari.info). GARI's mission is to inform consumers about existing accessibility solutions in the market today and help them identify devices with features that best help their individual needs. This includes mobile phones with built-in screen readers, "simple access" for persons who find today's user interfaces overwhelming, Wearables with haptic feedback, Smart TVs that allow voice recognition for accessing features, or mobile apps that have been developed specifically to help overcome a barrier in daily life, like finding accessible locations.



Peter Lonergan, Senior Policy Officer, European Emergency Number Association (EENA)

Peter Lonergan is a Senior Policy Officer working on accessibility matters at the European Emergency Number Association (EENA). EENA is an NGO dedicated to improving access to emergency communications in Europe.



Jurgita Butkevičienė, Associate Professor at the Faculty of Economics and Business Administration, Vilnius University, Lithuania

Dr. Jurgita Butkevičienė is an Associate Professor at the Faculty of Economics and Business Administration at Vilnius University, Lithuania. Her research and teaching focus on entrepreneurship, inclusive entrepreneurial ecosystems, institutional change, digitalisation and digital transformation, and social sustainability. Her research has been published in internationally recognised journals, including the Journal of International Management and the International Journal of Disaster Risk Reduction, as well as with leading academic publishers such as Palgrave Macmillan, Edward Elgar Publishing, and Routledge. Her work examines how institutional innovation, digital transformation, and

inclusive policies shape entrepreneurial ecosystems and sustainable business practices. Dr. Butkeviciene brings more than 20 years of professional experience across the business, government, and non-governmental sectors. She is part of the Lithuanian team at the global foresight think tank The Millennium Project and a member of the Academy of International Business.



Miroslav Vrankić, PhD, University of Rijeka, Croatia

Founder and CEO of E-GLAS

Miroslav Vrankić is a founder and CEO of E-GLAS, a university-based company from Croatia that develops assistive technology products. He is also a professor at the University of Rijeka, Faculty of Engineering. His passion is to develop meaningful projects by combining his scientific background in electrical engineering and digital signal processing with assistive technology applications that can change people's lives for the better. Miroslav is also a founder of ATAAC, a European conference dedicated to assistive technology and AAC (Augmentative and Alternative Communication): www.ataac.eu. His research interests include assistive technology, digital signal processing, EEG signal processing and BCI - Brain Computer Interfaces.



Zephyr Rankin, Research and Instruction Librarian, East Texas A&M University, USA

Zephyr Rankin is the Research and Instruction Librarian for STEM and Agriculture at East Texas A&M University. In his work in research and instruction, Zephyr specialises in implementing digital accessibility and Universal Design for Learning practices into library services, and has conducted presentations and hands-on trainings on accessibility, AI, data privacy, and digital literacy. He earned a Master's of Library Science from Emporia State University in 2022, a Digital Accessibility certificate from the Texas Digital Learning Association in 2025, and an Instructional Design certificate from the International Society for Educational Technology in 2026.